



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

February 6, 2025

Elena.barragan@lus.sbcounty.gov

Elena Barragan, Senior Planner
County of San Bernardino Land Use Services, Planning Division
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415

**Initial Study/Negative Declaration (IS/ND) for the
Proposed CSI Revision Project (Proposed Project)
(SCH No. 2025010202)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The County of San Bernardino is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD Staff (Staff) has provided a brief summary of the project information and prepared the following comments.

Summary of Proposed Project Information in the IS/ND

Based on the IS/ND, the Proposed Project involves the construction of two main components: 1) a new galvanizing line (#3 CGL) within an existing building, along with the addition of an approximately 9,000 square-foot extension to accommodate the new equipment; and 2) a new push pull pickle line (PPPL) to be located entirely within an existing structure at the California Steel Industries' (CSI) 430-acre facility. CSI is situated in the city of Fontana, within unincorporated San Bernardino County, at 14000 San Bernardino Avenue. A review of aerial photographs by Staff indicates that the nearest sensitive receptors (e.g., residents) are located approximately 1,340 feet east of the Proposed Project's property line. Construction and new equipment installation are expected to take place over a period of 24 to 30 months.¹

South Coast AQMD Comments

Revise Air Quality Analysis to Address Localized Impacts of the Proposed Project

CEQA Guidelines Section 15064 – Determining the Significance of the Environmental Effects Caused By A Project, sets forth requirements for considering both direct and indirect physical changes in the environment which may be caused by a project and to provide substantial evidence to assist with determining whether these effects may cause a significant impact. In the context of air quality, the CEQA document needs to contain an in-depth and detailed analysis which estimates the potential air quality impacts arising from both construction and operation of the Proposed Project. The air quality analysis in the IS/ND outlines how criteria pollutant emissions were quantified for both peak-day construction activities and operation of the Proposed Project and then compares these mass daily emissions to the corresponding South Coast AQMD Air Quality

¹ Initial Study PRAA-2023-00021 (IS/ND), p. 15.

Significance Thresholds.^{2,3} However, the air quality analysis does not address or evaluate the localized air quality impacts that may occur during construction and operation. Therefore, the Lead Agency is recommended to revise the air quality analysis to include:

- 1) An estimation of the maximum daily on-site construction emissions, including an analysis of the localized air quality significance impacts during construction.
- 2) An estimation of the maximum daily on-site operational emissions, including an analysis of the localized air quality significance impacts during operation.

There are multiple resources available to assist with performing these calculations. For example, for estimating construction and operation emissions, the California Emissions Estimator Model (CalEEMod) is a free tool available at www.caleemod.com, that may be used for this purpose.

For determining whether the Proposed Project has localized impacts, the South Coast AQMD's Localized Significance Thresholds (LST) methodology provides guidance. The Proposed Project is occurring at a large industrial facility, which is subject to South Coast AQMD Regulation XXX – Title V Permits because it is a major source of emissions. For this reason, the LST lookup tables may not be relied upon to determine whether there are significant localized impacts.^{4,5} Instead, LST guidance recommends conducting project-specific air dispersion modeling to evaluate the localized air quality impacts during construction and operation.

Assessment of GHG Emissions and Operational Hours for Emergency Standby Engine

The Proposed Project involves the installation of a new diesel-fired emergency standby engine with a rating of 900 brake horsepower (bhp).⁶ This engine is expected to operate up to two hours per day and 50 hours per year for maintenance and testing.⁷ However, in the event of a power outage, the emergency standby engine will be utilized to provide standby electrical power, so the IS/ND analysis assumes a total of 200 hours of operation per year for all purposes during the operation phase of the Proposed Project.⁸

In Appendix B, Table 2 – Summary of Emissions indicates that the new emergency standby engine is estimated to emit 23.7 metric tons per year of carbon dioxide equivalents (CO₂e). For reference, Figure 1 provides a screenshot of Table 2 in Appendix B.

² South Coast AQMD's Air Quality Significance Thresholds available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

³ IS/ND. p. 30

⁴ Final LST Methodology, July 2008. Table 3-2, available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>

⁵ South Coast AQMD Rule Book, Regulation XXX – Title V Permits available at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xxx>

⁶ IS/ND. Appendix B. p. 8 & p. 21.

⁷ *Ibid.* Appendix B. p. 8.

⁸ *Ibid.* Appendix B. p. 8.

Table 2 Summary of Emissions (tons/year)

Emission Source	Emissions (tons/year) [CO2e (MT/yr)]						
	ROG	NOx	SOx	CO	PM ₁₀	PM _{2.5}	CO2e
CGL Heaters	2.04	7.02	0.23	14.42	2.82	2.82	41,398.9
Emergency Standby Engine	0.01	0.02	0.00	0.13	0.00	0.00	23.7
Cleaning Section	0.00	0.00	0.00	0.00	0.90	0.90	0.0
Chem Treat	0.00	0.00	0.00	0.00	0.17	0.17	0.0
Ammonia Storage and Handling	0.00	0.00	0.00	0.00	0.00	0.00	0.0
Coating Line Thermal Oxidizer	0.14	0.47	0.02	0.97	0.19	0.19	4,651.6
Push-Pull Pickle Line	0.00	0.00	0.00	0.00	1.99	1.99	0.0
Total Combined Emissions – Onsite Emissions	2.19	7.51	0.25	15.52	6.07	6.07	46,074.2
Electricity Use	--	--	--	--	--	--	2,138
Water Use	--	--	--	--	--	--	3,067
Total Project-Related Emissions	2.19	7.51	0.25	15.52	6.07	6.07	51,279

Figure 1: Screenshot from IS/ND Appendix B, Table 2. 23.7 tons per year of CO2e for Emergency Standby Engine is based on 50 hours per year of use.

According to the CEQA Calculation-IS technical files provided by the Lead Agency, the 23.7 metric tons per year of CO2e is based on an assumption that the emergency standby engine will be operating 50 hours per year.⁹ To provide a more accurate assessment of the potential CO2e emissions for the emergency standby engine, the calculations of CO2e in the IS/ND should be updated to reflect 200 hours per year of operation, which represents the maximum potential emissions under a worse-case operational scenario. It is important to note that a South Coast AQMD permit for the emergency standby engine is required and may include a permit condition based on a potential to emit (PTE) that allows for operation of up to 200 hours per year, and which may also specify a maximum of 50 hours per year for conducting maintenance and testing. However, if the analysis in the IS/ND is not updated to reflect 200 hours per year of operation, then a permit condition will be applied which limits the hours of operation of the emergency standby engine to align with the number of hours analyzed in the IS/ND (e.g., 50 hours per year).

Omission of GHG Emissions from Additional Ammonia Deliveries

The IS/ND states on page 56 that “It is expected that additional deliveries of ammonia would occur routinely throughout the year, but no increase in the daily number of deliveries would occur.” However, Appendix B, Table 4 – Summary of GHG Emissions - SCAQMD Methodology, does not account for the increase in annual GHGs that would result from the additional mobile source emissions associated with these ammonia deliveries. For reference, Figure 2 provides a screenshot of Table 4 in Appendix B.

⁹ IS/ND technical files provided to South Coast AQMD staff via email (Elena Barragan, personal communication, January 21, 2025)

Table 4 Summary of GHG Emissions – SCAQMD Methodology

Emission Source	CO2e (MT/Year)
GHG Emissions	
Onsite Combustion Emissions	46,074.2
Electricity Use	2,138
Water Use	3,067
Construction Emissions	52
Total Project-Related Emissions	51,279
GHG Emission Offsets Required	46,074
Total Project-Related Emissions following Offset	5,205
SCAQMD CEQA GHG Threshold	10,000
Significant?	No

Figure 2: Screenshot from IS/ND Appendix B, Table 4. Table 4 does not account for the increase in annual GHG emissions from mobile sources due to additional ammonia deliveries.

Therefore, the Lead Agency is recommended to revise the GHG analysis to address the increased annual ammonia deliveries by: 1) quantifying the GHG emissions from these mobile source trips; and 2) incorporating this information into Table 4 of Appendix B.

Omission of Reactive Organic Gas (ROG) Emissions Associated with Galvanizing Line Coating Section

According to the CEQA Calculation-IS technical files provided by the Lead Agency, the ROG emissions from the Galvanizing Line Coating Section are estimated at 105.12 pounds per day but these emissions do not appear to be accounted for in Table 8 – Project Modifications Stationary Source Emission Estimates of the IS/ND. For reference, Figure 3 provides a screenshot of the ROG emissions attributable to the Galvanizing Line Coating Section as presented in the technical files provided to South Coast AQMD staff and Figure 4 provides a screenshot of Table 8 as found in the IS/ND.

Galvanizing Line Coating Section - Uncontrolled Emissions						
	Usage Rate	144 gal/day				
	Proposed EF	Units	PTE (lbs/hour)	PTE (lbs/day)	PTE (lb/month)	PTE (tpy)
ROG	0.7300	lb/gal	13.14	105.12	3,153.60	19.18
VOC content based on maximum VOC content of proposed coatings						
Hourly PTE assumes all coatings applied during 8-hour shift						

Figure 3: Screenshot of the technical files provided by the Lead Agency showing emissions from the Galvanizing Line Coating Section. The ROG emissions of 105.12 lbs/day are not reflected in Table 8 of the IS/ND.

TABLE 8

Project Modifications Stationary Source Emission Estimates (lbs/day)⁽¹⁾

Sources	Emissions (lbs/day)					
	NOx	SOx	CO	PM10	PM2.5	ROG
SCAQMD Significance Threshold	55	150	550	150	55	55
CGL Heaters	38.45	1.28	79.03	15.46	15.46	11.19
CGL Cleaning Section	--	--	--	4.94	4.94	--
CGL Chem Treat	--	--	--	0.93	0.93	--
Coating Line	8.64	0.14	17.76	1.74	1.74	1.26
Push-Pull Pickle Line	--	--	--	10.91	10.91	--
Emergency Engine	1.98	0.02	10.32	0.09	0.09	0.56
TOTAL Emissions	49.07	1.44	107.11	34.05	34.05	13.00
Offset Emissions ⁽²⁾	-49.07	-1.73	0	-40.87	0	-1.6
Emissions After Offset	0	-0.56	107.11	-6.81	34.05	-2.60
Significant Impact?	No	No	No	No	No	No

(1) See Appendix B for detailed emission calculations.

(2) Emission offsets will be required for the Project modifications by SCAQMD under Regulation XIII – New Source Review, and under Regulation 2005 – RECLAIM New Source Review. Absence emission offsets, the project itself would be less than SCAQMD CEQA significance thresholds.

Figure 4: Screenshot of Table 8 in the IS/ND. The ROG emissions of 105.12 lbs/day from the Galvanizing Line Coating Section – Uncontrolled Emissions are not reflected in Table 8 of the IS/ND.

The labeling and nomenclature between the CEQA Calculation-IS technical files and the line items in Table 8 do not appear to be consistent, making it difficult to follow the math. Also, an increase of uncontrolled ROG emissions of 105.12 pounds per day Galvanizing Line Coating Section exceeds the South Coast AQMD air quality significance threshold of 55 pounds per day for volatile organic compounds (VOC) during operation. (The acronyms VOC and ROG are used interchangeably.) This exceedance would reflect a significant air quality impact for operational VOCs which would require the preparation of an Environmental Impact Report unless mitigation is applied or air pollution control equipment is utilized, or both. While Table 8 includes some line items showing how some of these emissions may be offset as required by South Coast AQMD Regulation XIII – New Source Review, it is not clear how these offsets were calculated.¹⁰

To ensure that an accurate estimate of all stationary source emissions is reflected in the analysis, the Lead Agency is recommended to update Table 8 to include the following: 1) all of the uncontrolled emissions associated with the Galvanizing Line Coating Section as separate line items and to consistently label each row according to the specific equipment involved to align with the CEQA Calculation-IS technical files; 2) separate entries to reflect any emission reductions from air pollution control equipment (post-control emissions); 3) separate entries to reflect any offsets applied.

Conclusion

¹⁰ South Coast AQMD Rule Book, Regulation XIII – New Source Review available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final ND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the ND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. As such, please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final ND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final ND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sam Wang, Program Supervisor, at swang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

BR:SW:EA
SBC250107-02
Control Number