



South Coast Air Quality Management District

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Southwest Metal Company – Draft Removal Action Workplan

The South Coast Air Quality Management District (SCAQMD) staff has received the Draft Removal Action Workplan (RAW) for Southwest Metal Company and would like to be included in future public participation activities associated with the cleanup effort.

As stated in the Draft RAW, Southwest Metal Company, in cooperation with DTSC, will remove and properly dispose of contaminated soils at the project site in order to reduce the potential threat to human health and the environment. Approximately 8,000 cubic yards of potentially impacted soil will be excavated, segregated, and sampled. Based on analytical results, soil that exceeds the Site cleanup criteria will be transported offsite to a permitted disposal facility.

On page 2 of the Draft RAW, the lead agency states that the contaminated soils subject to excavation, removal, and disposal are impacted with elevated levels of total petroleum hydrocarbon and polynuclear aromatic hydrocarbon compounds. However, on page 11 of the document, the lead agency states that SCAQMD Rule 1166 – *Volatile Organic Compound Emissions from Decontamination of Soil* does not apply to the project. The SCAQMD staff would like to remind the DTSC that disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of Rule 1166. The SCAQMD staff is concerned that because the lead agency believes that Rule 1166 does not apply to the project, that steps may not be taken in order to comply with the requirements of Rule 1166. Additionally, given that the project site is located at a former battery breaking and secondary lead smelting facility, the SCAQMD expresses the utmost concern for the potential of fugitive lead dust emissions generated from the removal and disposal of the impacted soil and recommends that the lead agency develop specific measures to prevent and mitigate lead emissions in addition to compliance with SCAQMD Rule 1420 – Emissions Standard for Lead.

Mr. Isaac Hirbawi,
Project Manager

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The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Eugene Kang, Program Supervisor, at (909) 396-3524 if you have any questions regarding these comments. We look forward to reviewing and providing comment for the Final CEQA document associated with this project.

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
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JB:EK

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