



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Negative Declaration (ND) for the Proposed Polynt Composites USA, Inc., Lynwood, California

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final CEQA Document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes improvements to the soil vapor extraction (SVE) system including construction of four extraction wells, seven injection wells, and an above ground groundwater treatment system on two acres (proposed project). The project is located at 2801 Lynwood Road on the northwest corner of Lynwood Road and Franklin Street in the city of Lynwood. Additionally, the lead agency identified SCAQMD as a responsible agency. Therefore, the facility will be required to obtain SCAQMD permits before the construction and operation of the SVE system.

SCAQMD Staff's Summary of Air Quality Analysis

SCAQMD staff found that emissions resulting from the construction, more specifically installation of the proposed SVE system was estimated in CalEEMod, by opting to use the parking lot land use.¹ SCAQMD staff is concerned that the parking lot land use option does not adequately represent the potential emissions resulting from the proposed project. SCAQMD staff recommends the lead agency revise the air quality analysis, or include a discussion regarding the methodology of estimating emissions resulting from installation of the proposed SVE system in the final CEQA document.

Permits and Compliance with SCAQMD Rules

The final CEQA document should demonstrate compliance with applicable SCAQMD Rules, including, but not limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, and Rule 1166 – Volatile Organic Compound Emissions From Decontamination of Soil. Should there be any questions on permits, please contact the SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit SCAQMD's webpage at <http://www.aqmd.gov/home/permits>.

Conclusion

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA Document. The SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at (909) 396-2139, if you have any questions regarding these comments.

Sincerely,

¹ IS/ND. Appendix B, *CalEEMod Output Files*, Winter Run, Page 1.

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