



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Permit Modification for P. Kay Metal, Inc.

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. According to the Public Notice of Class 1 Permit Modification, P. Kay Metal, Inc. (also referred to as facility) formerly reclaimed lead and tin metal from off-site generated solder dross and recycled the metals into new solder and alloys under a Hazardous Waste Facility Permit issued by the Department of Toxic Substances Control (DTSC). The proposed DTSC permit modification consists of a request to proceed with the closure of the facility's former activity and a closure plan with procedures to close and remove the former hazardous waste management units at the facility that is located at 2448 East 25th Street on the southwest corner of East 25th Street and Minerva Street in the City of Los Angeles.

In the event that any existing equipment would be dismantled and removed as part of the closure, and/or if facility renovation or demolition is to take place, requirements of South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities¹ and U.S. Code of Federal Regulations Title 40 Chapter 61 Subpart M National Emission Standard for Asbestos² will apply and should be discussed in the closure plan and the final DTSC permit modification. Because lead is among the applicable toxic air contaminants listed in South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants³, it is recommended that the closure plan and the final DTSC permit modification include clarifications on if DTSC, or other agencies listed in Rule 1466(b), has designated, or plans to designate, the site for the contaminant listed as a concern. If the site is so designated and thus subject to the South Coast AQMD 1466 requirements, it is recommended that applicable Rule 1466 requirements be incorporated in the closure plan and the final DTSC permit modification. More information on Rule 1466 requirements is available on the South Coast AQMD's website⁴. Additionally, if the closure would involve any activity such as demolition or soil movement capable of generating fugitive dust, requirements of South Coast AQMD Rule 403 – Fugitive

¹ South Coast AQMD Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

² 40 CFR, Chapter 61, Subpart M. Accessed at: http://www.swcleanair.org/docs/misc/NES_Asbestos.pdf.

³ South Coast AQMD Rule 1466. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

⁴ South Coast AQMD. Compliance. Rule 1466. Accessed at: <http://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>.

Dust⁵ will apply and should be discussed in the closure plan and the final DTSC permit modification.

If you have any questions or wish to discuss the comments, please feel free to contact Steve Tsumura, Air Quality Specialist, at stsumura@aqmd.gov. Questions on South Coast AQMD Rule 1466 can be directed to Rule1466@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development and Area Sources

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⁵ South Coast AQMD Rule 403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.