

**From:** [Chuck Thomas](#)  
**To:** [MSFC-SSFL-EIS](#)  
**Cc:** [Mike Villegas](#); [Kerby Zozula](#)  
**Subject:** Ventura County APCD Comments on the SSFL DEIS  
**Date:** Thursday, September 26, 2013 11:09:27 AM  
**Attachments:** [VCAPCD 2 A Elliot SSFL DEIS.pdf](#)

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Please find attached Ventura County Air Pollution Control District comments on the SSFL DEIS.

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**Michael Villegas  
Air Pollution Control Officer**

September 26, 2013

Allen Elliott, SSFL Project Director  
National Aeronautics and Space Administration  
MSFC AS01, Building 4494  
Huntsville, AL 35812

Subject: National Aeronautics and Space Administration's (NASA) Draft Environmental Impact Statement (DEIS) for the Demolition and Cleanup at the Santa Susana Field Laboratory (SSFL)

Dear Mr. Elliott,

The Ventura County Air Pollution Control District (District) appreciates the opportunity to comment on the subject DEIS for demolition and environmental cleanup activities at the NASA-administered properties at the SSFL. The DEIS evaluates the potential environmental consequences associated with NASA's proposal to demolish existing structures and to remediate groundwater and soil on the federally-owned property that NASA administers at the SSFL in Ventura County, California.

The District is the local agency responsible for attaining and maintaining state and federal air quality standards and protecting the citizens of Ventura County from the harmful effects of air pollutants. The District's responsibilities in improving air quality in the region include: preparing plans for attaining and maintaining air quality standards; adopting and enforcing air quality rules and regulations; issuing permits for stationary sources of air pollutants; inspecting stationary sources and responding to citizen complaints; monitoring local air quality and meteorological conditions; and implementing public outreach campaigns.

As a complement to its official responsibilities under state and federal clean air laws, the District regularly participates in environmental assessments of public and private proposals that may impact Ventura County's air. The District supports public agencies with their environmental assessments and documents by providing needed information, guidance, and assistance that helps those agencies address and mitigate air quality issues of projects they are proposing or considering in Ventura County.

With this background and introduction, District staff offers the following comments and suggestions regarding the air quality section of the subject DEIS.

- 1) All demolition, construction, and excavation equipment such as compressor engines, generator engines, screens, crushers, conveyors, lighting, drilling rigs, etc. shall be

registered with the California Air Resources Board Portable Equipment Registration Program (PERP). In some cases, the equipment may not meet the applicability requirements of the PERP (function, time at facility, etc.) and will be required to obtain a District air permit. Equipment such as backhoes, bulldozers, front-end loaders, and dump trucks do not require a PERP or District permits, but must comply with the California Air Resources Board Diesel Off-Road Online Reporting System (DOORS) Program and Regulation For In-Use Off-Road Diesel Fueled Fleets. If a District air permit is required, the permit application shall comply with the best available control technology (BACT) and emission offset requirements of APCD Rule 26, "New Source Review." The air permit application shall also demonstrate compliance with District Rule 33, "Part 70 Permits", Rule 35, "Elective Emission Limits," or Rule 76, "Federally Enforceable Limits on Potential to Emit," as applicable.

- 2) The DEIS provides only preliminary details regarding the various soil cleanup technologies that are being considered as alternatives to excavation and offsite disposal. As stated, some of the soil cleanup technologies will require Ventura County APCD permits. To fully determine these permit requirements, a detailed description of each soil cleanup technology will be required. The power source for these soil cleanup technologies must also comply with District air permit requirements. Fuel-fired power sources such as an electricity generating engine may not comply with all air quality rules and grid electricity may be required to power the soil cleanup technologies. If a Ventura County APCD permit is required, the permit application shall comply with BACT and emission offset requirements of APCD Rule 26, "New Source Review." Note that the current Ventura County APCD Permit to Operate for the SSFL has permitted emissions of 2.37 tons per year of reactive organic compounds (ROC) and 5.86 tons per year of nitrogen oxides (NOx). These permitted emissions are considered to be the "baselines" when evaluating the APCD Rule 26 emission offset thresholds of 5 tons per year of ROC and 5 tons per year of NOx.
- 3) The ex situ treatment of contaminated soils using land farming may not comply with District rules and may not be permitted as proposed. Alternative ex situ soil remediation techniques, such as a covered aerated static pile, should be considered. In this technique, the contaminated soil is covered with a tarp or other impermeable cover and the required air is provided via blowers and piping with air emissions vented to an emission control device.
- 4) The DEIS also provides only preliminary details for the various groundwater cleanup technologies being studied. As stated, some of the groundwater cleanup technologies will require District air permits where volatile organic compounds (VOCs) or semi-volatile compounds are potentially emitted to the atmosphere. To fully determine these permit requirements, a detailed description of each groundwater cleanup technology will be required. The power source for these groundwater cleanup technologies must also comply with District air permit requirements. Fuel-fired power sources such as an electricity generating engine may not comply with all air quality rules and grid electricity

may be required to power the groundwater cleanup technologies. If a Ventura County APCD Permit to Operate is required, the permit application shall comply with BACT and emission offset requirements of APCD Rule 26, New Source Review.

- 5) Air Quality Mitigation Measure-3 (MM-3) proposes a “Dust Control Plan” for the project. The Ventura County APCD recommends that MM-3 be expanded to an “Emissions Control and Air Monitoring Plan.” During the excavation and temporary storage of contaminated soil, VOCs and various toxic air contaminants may be released into the atmosphere. The plan should include best management practices to prevent the emissions of VOCs and air toxics in addition to preventing the emissions of fugitive dust. An air monitoring program should also be developed to make sure that the project does not cause a violation of the National and California Ambient Air Quality Standards or Ventura County APCD Rule 51, Nuisance, Rule 62.1, Hazardous Materials, and Rule 74.29, Soil Decontamination Operations. The air monitoring program should include real-time, continuous, and/or periodic monitoring for PM<sub>10</sub>, VOCs, and air toxics such as polycyclic aromatic hydrocarbons and lead.

The “Emissions Control and Air Monitoring Plan” should incorporate the following requirements of District Rule 74.29, Soil Decontamination Operations: a) a certified organic vapor analyzer should be used to make sure that the aeration of contaminated soil is minimized or prevented, b) contaminated soil piles or soil surfaces should be treated with a vapor suppressant or covered with continuous heavy-duty plastic sheeting or other covering to minimize the emissions of VOCs and air toxics to the atmosphere; and, c) trucks used to transport contaminated soil shall also be enclosed, tarped or otherwise covered to minimize the emissions of dust, VOCs, and air toxics.

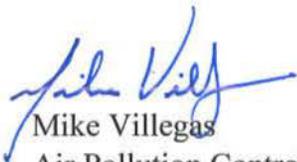
- 6) The proposed demolition and remediation activities at the SSFL will involve removal of structural materials and excavation and transport of up to 500,000 cubic yards of contaminated soils over a period of two years. These activities will require significant numbers of diesel equipment and vehicles to remove and deliver the structural debris and contaminated soils to storage and treatment areas within the SSFL boundaries and to off-site disposal facilities. Moreover, up to 167,000 cubic yards of backfill material will be brought in to restore excavated areas. This material will also be delivered and placed with diesel equipment. Diesel particulate matter has been designated a cancer-causing chemical in the State of California. Therefore, a screening health risk assessment (HRA) should be conducted to assess potential health risks of diesel exhaust emissions associated with project activities to nearby populations, especially sensitive receptors, such as residences, schools, daycare centers, and hospitals. This determination can be made by an appropriate health risk assessment. The California Air Pollution Control Officers’ Association (CAPCOA) has an HRA guideline document, titled *Health Risk Assessments for Proposed Land Use Projects* (June 2009), for assessing the health risk

impacts of airborne toxic and carcinogenic substances. The guidelines and associated documents are available from CAPCOA's website at <http://www.capcoa.org/documents>.

- 7) Vapor emissions and dust emissions from the excavation, handling, and on-site storage of contaminated soils may result in the emissions of toxic air contaminants such as chlorinated hydrocarbons and metals. Air toxics screening calculations or a HRA should be conducted to assess potential health risks of nearby populated areas as discussed above.
- 8) The DEIS should assess through dispersion modeling whether project-generated particulate pollutants (PM<sub>10</sub> and PM<sub>2.5</sub>) will exceed either state or federal air quality particulate standards in nearby populated areas.
- 9) Project conformity is addressed in Section 4 of the DEIS and Appendix I, *AQ General Conformity Analysis*. These discussions indicate that the emissions of material from the excavation and offsite disposal for both high and low soil remedial technologies are below the South Central Coast Air Basin's (SCCAB) general conformity thresholds of 50 tons/year for VOC and NO<sub>x</sub>. Soil remedial emission estimates for 2016 and 2017 are provided in Section 4 of the DEIS and Appendix I, *AQ General Conformity Analysis*. However, the emission estimates for demolition activities for 2014, although also below the SCCAB thresholds of 50 tons/year for VOC and NO<sub>x</sub>, are only presented in Section 4 and not found in Appendix I, *AQ General Conformity Analysis*. This information should be included in Appendix I as well.

Thank you again for the opportunity to provide comments and suggestions on the DEIS for this very important project. We hope you find them helpful. If you have any questions, please call me at 805-645-1440 or email me at [mike@vcapcd.org](mailto:mike@vcapcd.org).

Sincerely,



Mike Villegas

Air Pollution Control Officer

c: Peter Foy, County of Ventura  
Linda Parks, County of Ventura  
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