UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUL 27 2011

David Tilley
City of West Sacramento
Community Development Department
1110 West Capitol Avenue, 2nd Floor
West Sacramento, CA 95691

Subject: Final Environmental Impact Report / Environmental Impact Statement (FEIS) for the West Coast Recycling Group Metal Recycling Facility Project, Yolo County, California, March 2011 (CEQ# 20110222)

Dear Mr. Tilley:

The U.S. Environmental Protection Agency (EPA) is providing comments on the subject document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

We provided comments on the Draft Environmental Impact Statement on May 16, 2011. In that letter, we rated the DEIS Environmental Concerns – Insufficient Information, due to our concerns about the applicability California's Drayage Truck Regulations, emissions of sulfur oxide, and voluntary measures to reduce construction emissions.

While the FEIS does not resolve the applicability of the Drayage Truck Regulations, it does state that the Port and project proponent are working with the California Air Resources Board to assess the applicability of the regulations (p.3.2-21). We thank the City of West Sacramento for quantifying emissions of sulfur oxides from the project. Additionally, we are pleased that the project will use the Yolo-Solano Air Quality Management District's best management practices to reduce dust and mobile source emissions.

We encourage the City of West Sacramento to adopt, in its Record of Decision (ROD), all mitigation measures and appropriate best management practices, such as the measures to reduce dust and mobile sources during construction. We also encourage the City to include specific criteria for successful mitigation, consistent with CEQ guidance on mitigation and monitoring issued on January 14, 2011. If any mitigation measures in the FEIS are not adopted, the ROD should provide justification for this decision.

We appreciate the opportunity to review this FEIS. When the ROD is signed, please send a copy to the address above (Mail Code: CED-2). If you have any questions, please contact me at (415) 972-

3521 or contact Tom Kelly, the lead reviewer for this project, at (415) 972-3856 or kelly.thomasp@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Office

cc via email: Ernest Molins, Department of Housing and Urban Development
Matt Jones, Yolo Solano Air Quality Management District
Karen Huss, Sacramento Metropolitan Air Quality Management District
John Gruszecki, California Air Resources Board