



South Coast
Air Quality Management District

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FAXED: JANUARY 18, 2008

January 18, 2008

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Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West Seventh Street, 9th Floor
Los Angeles CA 90017

**Recirculated Draft Environmental Impact Report (Draft EIR) for the Proposed South Region
High School No. 12 Project**

The South Coast Air Quality Management District (SCAQMD) 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 Environmental Impact Report.

The SCAQMD staff is concerned that LAUSD is considering siting a high school for this industrialized corridor. This high school will be surrounded, within a 0.25-mile radius (1,320 feet) by approximately 31 commercial and manufacturing facilities with a potential to emit hazardous contaminants and odorous compounds. The proposed high school will bring students, teachers, and administrators into an industrial area that has the potential for nuisance odors from nearby facilities.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment
JK:CB:GM

LAC071220-08
Control Number

**Recirculated Draft Environmental Impact Report (RDEIR)
for the Proposed South Region High School No. 12**

Appendix D: Health Risk Assessment (Revised)

Truck Trips:

1. Based on the information in the RDEIR, it appears that the John Boyd Designs facility manufactures a substantial number of pieces of furniture per day. However, there is no information on the number of heavy-duty diesel trucks that would be necessary to haul away completed furniture. Heavy-duty haul trucks could potentially be a major source of diesel particulate matter (DPM) emissions, which are classified as a carcinogen by the California Air Resources Board. As a result, the health risk assessment (HRA) does not include DPM emissions in the analysis of cancer risks.

HRA, Odor and PM Issues

2. The revised Draft EIR qualitative concludes that the mitigated acute health risk, PM10 concentration, and odor impacts would be less than significant without providing the quantitative results. It is recommended that the lead agency provide the quantitative mitigated results in the Final EIR.
3. Regarding the health risk to the students, the SCAQMD staff believes that the health risk to the students presented in the Recirculated Draft EIR are underestimated and are calculated inconsistently with OEHHA Guidelines. The SCAQMD recommends that the lead agency recalculate the health risk to school children using an exposure duration that is consistent with OEHHA Guidelines and present this information in the Final EIR.
4. The air dispersion modeling files for odor modeling reveal that the calms processing routine was used. The calms processing routine must be bypassed when using SCAQMD meteorological data. The Final EIR/HRA should be revised to include air dispersion modeling with the calms processing routine bypassed.
5. The HRA air dispersion modeling was completed with the following non-regulatory option no stack tip downwash. The odor modeling was not. The same dispersion options should be used for both analyses in the Final EIR for consistency.
6. Vernon meteorological data were used for the HRA health risk air dispersion modeling. Compton meteorological data were used for the odor analysis air dispersion modeling. The odor study states that Compton meteorological data were used because it appears to be more conservative based on wind direction. The same meteorological data should be used for both analyses in the Final EIR for consistency.
7. The HRA uses a single, capped, merged stack to represent the multiple stacks at John Boyd Designs. The odor analysis models stacks as point sources and includes volume sources. Since the sources are not modeled consistently, there should be a discussion in the Final EIR that analyzes the differences between the resultant concentrations generated by the different source treatments. SCAQMD suggests that the most conservative concentration be used for both the health risk and odor analyses. In addition, if LAUSD chooses to use merged stacks a detailed discussion should be included that explains how stack parameters and placement of the merged stacks were chosen.

8. The variable emission factor averaging period in the HRA is eight hours. The variable emission factor averaging period for the PM analysis is ten hours. The variable emission factor averaging period should be consistent for all analyses.
9. The odor and PM analyses modeled emissions from the stacks for the paint booths, ovens and thermal oxidizer. It is not clear why modeling was performed simultaneously for the paint booths and ovens' stacks in addition to the thermal oxidizer stack. It is unclear if all three types of equipment were modeled to be conservative or if this is a mistake. If the former, this is acceptable; but should be explained in the text. If the latter, then the unmitigated scenario should be modeled as the stacks are currently configured. Further, under the mitigated scenario, for the odor and PM analysis emissions should only emanate from the thermal oxidizer stack and any devices not vented to the thermal oxidizer, i.e., devices vented to the thermal oxidizer should not have their own stacks as shown in the NohBell Report. In either case, a better description is required in the Final EIR.
10. Given the number of compounds emitted at the John Boyd Designs facility, there is no explanation as to how the chemicals used to represent odors were chosen. The Final EIR should include a description of the selection process. The description should also rank the compounds emitted by John Boyd Design by odor threshold.

Appendix E: John Boyd Designs Mitigation Strategy Report

11. On pages 4 through 6 the tables include a column heading "S/N," which appears to be a typo representing the application number, should be listed as "A/N." For several devices in each table, the A/Ns are incorrectly listed. Most likely an older version of the facility permit was used to prepare the table.

On page 6 of Section 3.4, the A/N for Oven #1 should be A55575 not 455575.

On page 6 of Section 3.5, the devices listed are not permitted devices. They are equipment and operations that are exempt from written permit pursuant to District Rule 219. In the table there is a typo (portable) for device E17, and again "S/N" should be "A/N". Suggested language for the text:

3.5 Other ~~Permitted~~ Devices Exempt from Written Permit

There are some other ~~permitted items~~ equipment and operations that are exempt from written permits pursuant to District Rule 219 related to "miscellaneous" and "cleaning" equipment and operations that are listed in the Title V facility permit.
12. The fourth paragraph on page 7 states "all spray booths are ... subject to...Rule 1303 BACT Requirements..." BACT determinations are made at the time of permitting. It should be noted that not all spray booths are subject to current BACT requirements.
13. The table of compounds on page 15 lists percent in the far right column. This should be clarified as weight percent or volume percent of the material or of the VOC. The table also lists the varnish as 100% formaldehyde and the Clean Sealer as containing 100% Butoxyethanol, while these two coatings also contain acetone and the clear sealer contains n-Butylacetate as well – the totals are more than 100% and there are still other ingredients not listed. Clarification is required on what these numbers actually represent.
14. On page 18 the five baffle booths are recommended to be replaced with new booths that have an "integrated filter material racking system." New permit applications would be required to replace the spray booths. Regulation XIII requires that most new equipment, including replacement equipment would be subject to BACT. The installation of a regenerative thermal oxidizer (RTO)

could meet BACT requirements based on current guidelines. There is an exemption in Rule 1304 from offsets and modeling requirements for functionally identical replacements if there is no increase in the potential to emit for any air contaminant. However, since these booths are “grandfathered”, in order to ensure there is no increase in emissions from the facility due to the replacements, a VOC mass emission limit would have to be established based on the last two years of actual coating and solvent usage. If the facility operator accepted a permit condition based on the average VOC emissions, then this exemption would apply and offsets would not be required. In this situation, the booths would lose their grandfathered status.

15. With regard to the regenerative thermal oxidizer (RTO) that would potentially be used for the facility and described on page 19, a particulate filter should be installed just upstream of the RTO (in addition to appropriate filters in each spray booth) to ensure a clean exhaust stream to the RTO. The SCAQMD permits will also require continuous monitoring and recording of the temperature in the combustion chamber of the RTO and periodic source tests to determine collection and destruction efficiency of the system.
16. The plan does not specify the amount of exhaust flow the RTO would have to be designed to handle, which would determine the physical size of the RTO. Depending of the exhaust flow rate, more than one RTO unit may be required.
17. The lead agency s should be aware that a fume exhaust system may be required on the spray booths.