



South Coast
Air Quality Management District

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FAXED: September 18, 2009

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Ms. Lisa Dugas
Los Angeles World Airports
Environmental Services Division
7301 World Way West, 3rd Floor
Los Angeles, CA 90045-5803

**Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed
Los Angeles International Airport (LAX) Central Utility Plant Replacement 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 either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff appreciates the fact that the lead agency allowed additional time in which to submit comments. 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 EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura".

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SS:EE:DG

LAC090730-01
Control Number

Construction and Operational Air Quality Analysis

1. In Section 4.2.6 (Impact Analysis) of the Air Quality Analysis for the Draft EIR the lead agency assesses the localized air quality impacts from the proposed construction activities. The lead agency summarizes the maximum daily construction emissions from the project's proposed recycled/reclaimed water treatment facility in Table 4.2-14 on page 4-80. On page 4-79 the lead agency states that the closest alternative location for the recycled/reclaimed water treatment facility to a sensitive receptor is Site 3, however, the lead agency does not clearly delineate the desired location for the facility or the alternative location(s) and its distance from the central terminal area. As a result, SCAQMD staff cannot determine the potential peak daily emission impacts from the project.

SCAQMD staff recommends that the lead agency clearly delineate the potential sites for the recycled/reclaimed water treatment facility in Figure 4.2-1 and 4.2-3 and demonstrate that the distance between the central terminal area and the two potential recycled/reclaimed water treatment facility sites does not create shared impacts among any sensitive receptors during project construction. Once the lead agency has revised Figure 4.2-1 and 4.2-3 the SCAQMD staff requests that the lead agency revise Table 4.2-14 (Emissions From Recycled/Reclaimed Water Treatment Facility and Pipeline Construction) of the Construction Air Quality Analysis in the Final EIR quantifying peak daily air quality impacts and summarizing all emissions from the planned construction activities including NO_x, SO_x, CO, PM₁₀, PM 2.5 and VOC.

2. On page 4-59 of the Draft EIR the lead agency states that the ammonia emissions were calculated using the turbine exhaust gas flow rate and assumed concentration of ammonia in the exhaust gas. The lead agency assumed concentrations of 5 parts per million by volume (ppmv) based on the notion that this is the limit for ammonia slip from selective catalytic reduction (SCR) units typically imposed by SCAQMD. However, the current SCAQMD's current best available control technology (BACT) requirements for a major source facility limit ammonia slip from SCR units to 2.5 ppmv. SCAQMD staff requests that the lead agency revise the ammonia emissions calculations to reflect the current SCAQMD BACT requirements for a major source facility.

Health Risk Assessment

3. The health risk assessment conducted by the lead agency considered risks based on the inhalation pathway and did not include a multi-pathway analysis, as recommended by the SCAQMD. As a result the health risk impacts concluded by the lead agency were under-estimated. For example, using the maximally exposed worker receptor, the existing cancer risks are 0.46 per million which will increase to 0.53 per million with the project. Thus, the incremental cancer risk increase is 0.07 per million which is higher than the 0.004 per million reported in the DEIR. The

SCAQMD staff requests that the lead agency revise the health risk assessment using the guidance found at the following web addresses:

http://www.aqmd.gov/prdas/ab2588/pdf/AB2588_Guidelines.pdf

<http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html>

http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html

Regional and Localized Construction and Operational Mitigation

4. In addition to the air quality mitigation measures proposed in Table 4.2-10 on page 4-76 and 4-77 of the Draft EIR the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

NOx:

- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable,
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
- Require the use of alternative fueled off-road construction equipment,
- Restrict operation to “clean” trucks, such as a 2007 or newer model year,
- Develop park and ride programs,
- Improve traffic flow by signal synchronization, and
- Require construction parking to be configured such that traffic interference is minimized.

Fugitive Dust:

- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered,
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation, and
- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks.

VOC

- Construct or build with materials that do not require painting, and
- Require the use of pre-painted construction materials.

Additional construction and operational mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

In addition to the above NOx measures, SCAQMD staff recommends modifying the following existing mitigation measures included in Table 4.2-10 as follows.

- Prohibit construction vehicle and engine idling in excess of ~~ten~~ five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,
- Specify ~~combination of~~ conditions for electricity service from power poles and portable diesel or gasoline fueled generators using "clean burning diesel" fuel and exhaust emission controls for electrification of service equipment and auxiliary power units at the facility,
- Reroute construction trucks vehicles away from congested streets and prohibit staging and parking of construction vehicles (including workers' vehicles) on streets adjacent to all sensitive receptors such as schools, day care centers and hospitals.