



South Coast Air Quality Management District

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E-mailed: October 14, 2010

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Review of the Final Subsequent Environmental Impact Report (SEIR) for the Auto Club Speedway Project

South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be considered prior to adoption of the Final SEIR. AQMD staff previously commented on the Recirculated Draft SEIR on June 3, 2010. While the lead agency responded to these comments in the Final SEIR, some comments were not adequately addressed. This letter will focus on those remaining concerns.

As stated in our previous letter, AQMD staff is concerned that the proposed operation of the drag strip on the north side of the project site will bring a potentially significant source of emissions in close proximity to residences. Our previous comment letter detailed the analytical approaches that are needed to adequately evaluate potential air quality impacts. AQMD staff is concerned that the revised air quality analysis presented in the Final SEIR is missing several key elements and does not provide substantial evidence to support the lead agency's assertion that air quality impacts from this project are less than significant. Specifically, AQMD staff strongly encourages the lead agency to conduct a localized air quality analysis of criteria pollutants. Without this analysis, the lead agency has not presented to the public or decision makers the potential impacts of the project. The lead agency should quantify emissions from tire burnouts or present further justification for its decision to not include these emissions. These emissions may be substantial as they can occur up to 1000 times per day. In addition, the lead agency should provide details describing the source of its criteria pollutant emission factors. Further details regarding these concerns are attached to this letter.

Staff is available to work with the lead agency to address these issues and any other air quality questions that may arise. Please contact Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

SN:IM

SBC100916-02
Control Number

Localized Air Quality Analysis

In order to determine if emissions are significant, the AQMD staff requested that the lead agency conduct a localized air quality analysis consistent with standard AQMD methodology (Comment #2 and #9 from June 3 letter). A localized air quality impact analysis evaluates criteria pollutant (PM10, PM2.5, NO2, CO) concentrations against federal and state Ambient Air Quality Standards (AAQS). Although a copy of the AAQS within AQMD's jurisdiction are presented in Appendix B of the Air Quality Modeling Technical Study in the Final SEIR, no analysis was conducted. Without this analysis, the lead agency cannot determine if the project will violate an air quality standard or expose sensitive receptors to substantial pollutant concentrations. This analysis is critical as the lead agency determines that all air quality impacts are less than significant for this project. Guidance regarding a localized air quality analysis is available from AQMD.¹

Tire Burnouts

Because tire burnouts are expected to occur up to 1000 times in a single day, AQMD staff recommends that the lead agency include this emission source in all aspects of the air quality analysis, including regional emissions, localized emissions, and the Health Risk Assessment. The lead agency should consider using the following references to quantitatively evaluate this emission source.

- Emission factors from EPA's AP-42 section 2.5 (Open Burning) may be applicable to the heating/smoking of tires. Although this source is not exactly equivalent to a tire fire, it should be noted that AP-42 section 2.5 states that "A greater potential for emissions exists at lower burn rates, such as when a tire is smoldering, rather than burning out of control."
- Equation (1) from EPA's AP-42 section 13.2.1 (draft released in June 2010) should be applicable to evaluating the emission of dirt and grit removed from tires and the drag strip during tire burnouts *and* the race itself. Care should be taken to ensure that a conservative silt loading value is used to account for the considerable tire slippage (and subsequent loading of road dust from tire wear) that occurs during racing activities.

The lead agency does not provide sufficient justification to omit tire burnouts as a potential source of omissions. The only explanation provided is included in the Air Quality Technical Study attached to the Final SEIR which states that "... the literature suggests that burnouts are primarily water vapor (i.e., steam) and that actual removal of the tire material (i.e., burning of the tire) is neither intended nor desired for racing." This explanation does not provide the substantial evidence needed to omit this source of emissions from the modeling analysis for the following reasons.

1. While the statement refers to "the literature", no specific references are provided that support this assertion.
2. The statement implies that the emissions from this activity are de minimis, however it does not provide an explanation for the visible white smoke plumes and common distinctive odors associated with this activity.
3. The intent to remove tire material is irrelevant to the fact that tire material removal actually occurs. AQMD staff understands that tire burnout occurs prior

¹ www.aqmd.gov/ceqa/hdbk.html

to every race in order to improve tire traction. Traction is improved by removing dirt and grit embedded into the tire and track through mechanical agitation, by heating the tire through friction, and by laying down a thin layer of rubber from the tire onto the track. Each of these processes has the potential to generate substantial emissions.

Emission Factor References

The lead agency presented criteria pollutant emission factors in an electronic spreadsheet that was sent to AQMD staff along with the Final SEIR but was not present in the paper copy. The source of the criteria pollutant emission factors is not clear in the materials provided. Upon revision of the Final SEIR or Recirculated Draft SEIR, the lead agency should provide justification and references for the criteria pollutant emissions factors used in the analysis.

Modeling Parameters

In the ISC modeling file, the sigma y volume source parameter for the drag strip is listed as 13.95 meters. This equates to a volume length of 30 meters, or 98 feet. It appears that meters and feet have inadvertently been swapped for this parameter as the lane width is only 30 feet. The true sigma y should be approximately 4.25 meters. This value should be revisited and updated if necessary.