



South Coast Air Quality Management District

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E-mailed: September 24, 2010, 2010
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September 24, 2010

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Review of the Draft Mitigated Negative Declaration (Draft MND) for the San Antonio Community Hospital Expansion Project

The South Coast Air Quality Management District (AQMD) 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 incorporated into the revised draft or final MND (draft or final MND) as appropriate.

AQMD staff is concerned that diesel emissions from emergency generators proposed at the project site could expose sensitive receptors such as residential communities and a park to significant air quality and health risk impacts. Specifically, AQMD staff notes that the project's air quality impacts calculated in the draft MND could be underestimated because emissions from emergency generators proposed at the project site are not accounted for in the air quality analysis. Further, AQMD staff recommends that the lead agency revise the draft MND to include potential health risk impacts from the emissions from these emergency generators. In the event that the lead agency identifies any significant impacts from the project AQMD staff recommends that the lead agency provide additional mitigation in accordance with section 15370 of the CEQA Guidelines, to the extent feasible.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the final MND. Further, staff is available to work with the lead agency to address these issues and any other air quality 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 cursive script that reads "Edward Eckerle".

Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

EE:DG

SBC100824-03
Control Number

Regional and Localized Operational Emissions from Emergency Generators

1. In Section 2.3 (Description of the Proposed Project) of the draft MND the lead agency states that the proposed project includes two 1,500 kilowatt emergency generators to provide emergency power to the new hospital addition. Also, on page 4-19 in Section 4.3 (Air Quality) of the MND the lead agency briefly discusses the use of the generators; however, the lead agency does not provide a clear description of the anticipated operational activity for these generators. Further, in Section 4.3 the lead agency assesses the regional and localized air quality impacts from the project's operational activities, however, it does not appear that the lead agency included emissions from the above mentioned generators in the estimated air quality impacts, as a result, the project's regional and localized operational air quality impacts could be underestimated.

AQMD staff recommends that the lead agency revise the draft MND to include emissions from the emergency generators proposed at the project site, quantifying peak daily air quality impacts and summarizing all emissions from the planned operational activities including NO_x, SO_x, CO, PM₁₀, PM_{2.5}, VOC and CO_{2e}. The AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The AQMD recommends that the lead agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the AQMD's Subscription Services Department by calling (909) 396-3720. In addition to revising the regional air quality impacts AQMD staff recommends evaluating localized air quality impacts (including emissions from emergency generators) from the project to ensure that nearby sensitive receptors are not adversely affected by the operational activities that are occurring in close proximity. AQMD staff recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at the following web address:
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

Health Risk Assessment Emission Factors

2. As the lead agency is aware CARB identified PM from diesel-fueled engines as a toxic air contaminant (TAC) in 1998, following, an exhaustive 10-year scientific assessment process. In addition, as part of the identification process, the Office of Environmental Health Hazard Assessment (OEHHA) evaluated the potential for diesel exhaust to affect human health. OEHHA found that exposure to diesel PM resulted in an increased risk of cancer and an increase in chronic non-cancer health effects including a greater incidence of cough, labored breathing, chest tightness, wheezing, bronchitis, and asthma. Therefore, AQMD staff recommends that the lead agency revise the draft MND to include potential health risk impacts from emissions from the emergency generators proposed at the project site.

Specifically, AQMD staff requests that the lead agency demonstrate the potential health risk impacts for the proposed project. The lead agency shall quantify potential health risk impacts and make a significance determination in the final MND from

implementation of the proposed project. The AQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from for CEQA Air Quality Analysis can be found at:

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

In the event that the lead agency identifies any significant health risk impacts from emergency generator emissions AQMD staff recommends that the lead agency provide mitigation in accordance with section 15370 of the CEQA Guidelines, to the extent feasible.

Regional and Localized Air Quality Mitigation:

3. In the event that the lead agency's revised draft MND or final MND requested in comment #1 demonstrates that any criteria pollutant emissions from the regional and/or localized operational emissions analysis create significant adverse impacts the AQMD recommends that the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. A list of mitigation measures can be found on the AQMD's CEQA webpage at the following internet address:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm