



South Coast Air Quality Management District

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E-Mailed: December 21, 2012
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Mr. Robert Avila
85 East State Street
Pasadena, CA 91105-3418

Review of the Draft Environmental Impact Report (Draft EIR) for the Glenarm Power Plant Repowering Project

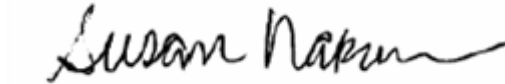
The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft Environmental Impact Report (Draft EIR) the project exceeds the AQMD's CEQA regional construction emissions threshold for VOC, NOX, CO and PM2.5 as a result of commissioning. Further, the Draft EIR demonstrates significant greenhouse gas (GHG) emissions during operation of the proposed project. However, the lead agency has provided limited construction and operational mitigation measures to reduce the significant air quality and GHG impacts demonstrated by the Draft EIR. Therefore, the AQMD staff recommends that the lead agency provide additional mitigation in Final EIR pursuant to CEQA Guidelines Section 15126.4 to address these concerns. Details regarding these comments are attached to this letter.

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". The signature is fluid and cursive, with a long horizontal flourish at the end.

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN:CM:DG

LAC121113-03
Control Number

Peak Daily Regional Construction Emissions

1. Based on the project's peak daily construction emissions values presented in Table 4.B-4 of the Draft EIR the project exceeds the AQMD's CEQA regional construction emissions threshold for VOC, NOX, CO and PM2.5 are significant. For example, the project's peak daily NOX emissions during construction (specifically commissioning) exceed the AQMD's CEQA regional construction NOX emissions threshold by 2,274 lbs/day (i.e., over 20 times higher than the regional NOX threshold). Despite Table 4.B-4, the lead agency determined that the project's air quality impacts during construction will be less than significant. The Draft EIR discussed the conclusion for regional and localized construction impacts together. Specifically, on page 4.B-37 of the Draft EIR the lead agency states, "air dispersion modeling of NO2, CO, SOX and PM2.5 emissions confirm that emissions ... would not result in a significant impact to regional or localized air quality." However, air dispersion modeling for construction emissions is strictly used to determine localized air quality impacts and should not be used to determine regional construction air quality impacts. Therefore, AQMD staff recommends that the lead agency clarify its regional air quality significance determination for construction of the proposed project.

Construction Mitigation Measures

2. The AQMD staff recognizes that the project's significant construction emissions are a direct result of commissioning for the proposed project. However, given the elevated level of emissions during this phase of construction the AQMD staff recommends that the lead agency minimize regional air quality impacts by ensuring that any simultaneous emissions activity during commissioning is minimized. Therefore, AQMD staff recommends that the lead agency provide the following additional mitigation pursuant to CEQA Guidelines Section 15126.4.
 - a) Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
 - b) Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
 - c) Reroute construction trucks away from congested streets or sensitive receptor areas,
 - d) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
 - e) Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
 - f) Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,
 - g) Construct or build with materials that do not require painting,
 - h) Require the use of pre-painted construction materials,
 - i) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). If the lead agency determines that 2010 model

year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements,

- j) Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)¹ have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
- ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Greenhouse Gas Emissions

3. Given that the lead agency determined that the proposed project will exceed the GHG emissions thresholds the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

¹ For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

Energy and Other

- a) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the project site to generate solar energy for the facility.
- b) Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
- c) Maximizing the planting of trees in landscaping and parking lots.
- d) Use light colored paving and roofing materials.
- e) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- f) Install light colored “cool” roofs and cool pavements.
- g) Limit the hours of operation of outdoor lighting.
- h) Install energy efficient heating and cooling systems, appliances and equipment, and control systems.
- i) Require use of water-based or low VOC cleaning products at the project site.

Applicable Permitting Requirements and Emissions Calculations

4. Based on a review of Chapter 4 (B) of the Draft EIR the AQMD staff recommends that the lead agency revise and/or clarify the following text to accurately summarize the regulatory requirements applicable to the proposed project.
 - a) On page 4.B-2: The applicable New Source Performance Standards (NSPS) is Subpart KKKK.
 - b) On page 4.B-9: Regulation IX should reference Subpart KKKK instead of Subpart GG.
 - c) On page 4.B-10: Not exempt from Rule 1303 - BACT; but they are exempted from modeling and offsets per Rule 1304(a)(2).
 - d) On page 4.B-32: NO_x CEMS per Rule 2012 and CO CEMS per Rule 218.
 - e) Also, in Table 4.B-14 of the Draft EIR the annual operational emissions don't appear to include start-up and shutdown emissions in the totals, therefore, the NO_x, CO, and VOC emissions may be underrepresented.