



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

Emailed July 2, 2012

July 2, 2012

Julie Van Wagner
Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE SCATTERGOOD 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 meant as guidance for the lead agency and should be incorporated into the Final EIR.

The lead agency proposes to remove the existing Scattergood Generating Station (SGS) electrical generation Unit 3 from operation and replace its generating capacity with modern higher efficiency generation units with a gross generating capacity of up to 590 MW. As part of the proposed project, the lead agency would also physically and permanently derate the existing SGS generation Unit 1 such that there would be no increase in the total gross generating capacity of the station. The proposed project would also include associated cooling units, pollution control systems, and ancillary facilities necessary for the operation of the new generation units. The existing Unit 3 would also be demolished under the proposed project.

There appear to be several assumption that have been made in the calculation of potential emission impacts from this project that do not have corresponding enforceable measures in the Draft EIR. In order to ensure that the stated impacts are accurate in the EIR, the calculations should be revisited to determine if they are accurate, and if so, additional measures should be added to the Draft EIR to ensure that the stated operations and construction activities occur as predicted. In addition, clarification should be provided regarding the greenhouse gas calculation methodology. Details regarding these comments are contained in the attachment.

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 Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact James Koizumi, Air Quality Specialist – CEQA Section, at (909) 396-3234, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial 'I' and 'M'.

Ian MacMillan

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

IM:JK
LAC1206XX-XX
Control Number

1. Operational Emissions During First Six Months

Peak operational emissions were estimated by subtracting the project emissions (new turbine systems, other new sources, and the derated Unit 1) from the existing emissions (Unit 1 and Unit 3). This operating scenario does not appear to match the potential for overlapping operations during the first six months after commissioning. Based on the text on page 3-6 of the EIR, during the six months after commissioning, the new turbine systems, other new sources, and the derated Unit 1 could all operate at the same time as the existing Unit 3. Therefore, the peak emissions up to six months after commissioning should include the existing Unit 3 (boilers) in addition to the new turbine systems, other new sources, and the derated Unit 1. If all of these sources are run at the same time during this period, the proposed project might be significant for operational NO_x, CO, PM₁₀, and PM_{2.5} emissions. The Final EIR should clarify these operations and if emissions are found to be significant, additional mitigation measures should be considered to reduce these impacts to a less than significant level.

2. Diesel Particulate Filters

Page 1-7, of the Air Quality and Climate Change Technical Report for the Scattergood Generating Station Unit 3 Repowering Project report states that all black start generators would be equipped with diesel particulate filters. This is reflected in emission estimates. Therefore, a mitigation measure should be added that requires all black start generators to be equipped with diesel particulate filters.

3. Greenhouse Gas Impacts

GHG impacts from the operation of the project are evaluated using a two-fold threshold. First, the efficiency of the CCGS and SCGS systems is compared to the target of 1,100 lb CO₂e/MWh established by SB 1368. Second, the GHG impacts from construction and operation of emergency generators and circuit breakers are compared to the AQMD's threshold of 10,000 metric tons of CO₂e per year. Using this approach, the project is determined to have a less than significant GHG impact in the Draft EIR.

AQMD staff requests that the lead agency provide further clarification regarding potential GHG impacts. First, additional substantial evidence should be provided describing why the entire project emissions should not be evaluated against the AQMD threshold of 10,000 MT CO₂e/year as the AQMD threshold does not contain guidance for partitioning GHG emissions. Second, additional information should be provided that clarifies how the efficiencies of the proposed project relate to EPA's recently proposed Carbon Pollution Standard for New Power Plants.

4. Commissioning Calculations

Table B-16 states that commissioning of both the Flex Plant 30 and Flex Plant 10 would occur over 24 hours per day. However, the emissions presented in the Peak Daily Emission Table for Scenario 2 (which is mistakenly labeled Scenario 1) appears to be estimated based on 23 hours per day (e.g., 222.6 pounds per hour of NO_x x 24 hours = 5,343 pounds; not 5,119.8 pounds as presented in the peak daily emissions). These underestimated commissioning emissions are also presented in Table 6-7. The calculations or text in the EIR should be corrected to be consistent.

Also, commissioning (included in construction estimates) is significant for VOC, CO, NO_x, PM₁₀ and PM_{2.5} emissions. Since testing and maintenance emissions from the black start

engines are not included in the emission estimates, a mitigation measure should be included that prohibits the testing and maintenance of the black start engines during commissioning.

Lastly, emissions from commissioning assumed that only one combined cycle system would be commissioned at a time for the Siemens scenario and the combined cycle and simple cycle systems would not be commissioned at the same time for the GE scenario. Therefore, mitigation measures should be added that prohibits the commissioning of both combined cycle systems at the same time for the Siemens scenario and that prohibits the commissioning of the combined cycle and simple cycle systems at the same time for the GE scenario. Otherwise, emissions impacts may have been underestimated in the Draft EIR.

5. Fugitive Dust

When developing fugitive emission factors for the proposed project, the consultant used the moist soil moisture content from the 1993 SCAQMD CEQA Air Quality Handbook and a 61 percent control factor for watering. This level of control may not be achievable with soil that is already moist pre-watering. The dry soil moisture content of two percent should be used if watering is used as mitigation and no project specific data is available. The project proponent should either use the two percent dry soil moisture content with the control factor for watering in the EIR calculations, use soil moisture contents as measured at the proposed project location in the EIR calculations, or include onsite monitoring to prevent any violations of Rule 403.

6. Offroad Equipment

Page 4-1, of the Air Quality and Climate Change Technical Report for the Scattergood Generating Station Unit 3 Repowering Project report states that off road emission factors were obtained from the SCAQMD website and that “the equipment-specified load factors have been updated by multiplying the emission factor by 0.67, consistent with the CARB’s recently released off-road mobile source emission inventory model (OFFROAD 2011).” These modified emission factors are presented in Table 6a of the same EIR document. This 0.67 adjustment is not consistent with OFFROAD 2011. OFFROAD 2011 contains other adjustments in addition to the load factors, such as to populations and operating hours, which in some cases results in emission factors that are greater than only multiplying the OFFROAD 2007 emission factors by 0.67. It does not appear to affect significance determinations for the proposed project, but may affect other proposed projects, if this practice is repeated for them. Unadjusted emissions factors from either OFFROAD 2007 or OFFROAD 2011 should be used to develop emission estimates for the proposed project, unless further substantial evidence is provided for the adjustment.

7. Overlapping Construction Phases

Since emissions from each construction phase (Phase 1, Phase 2 and Phase 3) were estimated and evaluated separately, a mitigation measure should be added to prevent overlap of these phases. There also appears to be a typo on page 4-13 of the Air Quality and Climate Change Technical Report for the Scattergood Generating Station Unit 3 Repowering Project report. The second sentence under the commissioning subheading states “The Siemens Flex-Plant 30 CCGS will also be commissioned in 24 phases.” Since the first sentence under the commissioning subheading states “The Siemens Flex-Plant 30 combustion turbine will be commissioned in 24 different phases,” it appears that the second sentences should be corrected to state “The Siemens Flex-Plant 10 CCGS will also be commissioned in 24 phases.”