



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Assessment (Draft EA) and Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed Los Angeles International Airport (LAX) Runway 6R-24L Runway Safety Area (RSA) Improvements Project

The South Coast Air Quality Management District (SCAQMD) 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 CEQA document.

In the project description, the Lead Agency proposes to make improvements to Runway 6R-24L at LAX. These improvements are intended to improve safety and to comply with airport design standards as promulgated by the Federal Aviation Administration (FAA). Construction is expected to begin in late 2015 and be completed by the end of 2016.

Project emissions were estimated in the Draft EA/Draft IS/MND using the FAA required Emissions and Dispersion Modeling System (EDMS) to estimate on-airport aircraft emissions. The SCAQMD staff has concerns about the project modeling analysis and permitting requirements for portable equipment operating during construction. The SCAQMD staff recommends that all the modeling be updated to ensure that there are no significant impacts. Further details concerning the modeling based on SCAQMD staff comments and permitting are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final NEPA/CEQA document. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

Attachment

JW:JC:GM

LAC150313-01 Draft EA

LAC150320-01 Draft IS/MND

Control Numbers

Air Quality Analysis - Dispersion Modeling

1. In the Draft EA/Draft IS/MND, the Lead Agency determined that construction and operational impacts are less than significant. The SCAQMD staff recommends the following comments be incorporated in the air quality modeling, as applicable and that the modeling be updated in order to demonstrate that project air quality impacts are less than significant.
 - a) In the AERMOD modeling, the Lead Agency used meteorological data from LAX as on-site data. In the AERMET file, the Lead Agency used an anemometer height of 38.4 meters, while the ASOS website indicates that the anemometer height for LAX should be 33 feet. Additionally, when processing meteorological data with AERMET for AERMOD applications, EPA suggests that a threshold wind speed of 0.5 m/s be used. SCAQMD staff therefore recommends the Lead Agency revise the AERMET analysis using the correct anemometer height and threshold wind speed.
 - b) In the AERMOD modeling, the Lead Agency only included fenceline receptors along the project property boundary and did not include a receptor grid. In order to ensure that the maximum impacts from the project have been identified, SCAQMD staff recommends the Lead Agency include a receptor grid of no more than 100 meters spacing, extended out from the fenceline to a distance that demonstrates that the project's maximum impacts are accurately captured.
 - c) The Lead Agency used EDMS to assign elevations of the sources and receptors in the AERMOD dispersion modeling. While it is acceptable to use EDMS to assign the elevations of the various airport sources (such as take-off and landing of aircraft), SCAQMD staff recommends that the Lead Agency use AERMAP to assign the elevations of the receptors used in the AERMOD modeling.
 - d) In the AERMOD input files, a custom coordinate system was used due to limitations in EDMS. The coordinates are in the UTM system but the Y-coordinate had 3,000,000 meters subtracted from it. In order to ensure that the elevations for each receptor are assigned correctly, SCAQMD staff recommends that for AERMOD modeling, the Lead Agency convert all UTM coordinates back by adding 3,000,000 meters to the Y-coordinate and run AERMAP to assign the elevations.
 - e) In the AERMOD input file, an hourly emission file was used with the sources. However, the Air Quality analysis did not include a description of the hourly emission profile and this file was not included in the electronic files provided to SCAQMD staff for review. Therefore, SCAQMD staff recommends the Lead Agency include a description of the hourly emission profiles used and then submit the electronic files when responding to SCAQMD staff comments for review.

Permitting Requirements for Portable Equipment

2. Based on the project description, the Lead Agency's construction equipment list includes portable generators, air compressors, and aggregate crushing/screen equipment. The Lead Agency is reminded that this portable equipment would require

a SCAQMD permit under SCAQMD Rule 203(a) if operated anywhere at the airport after a one year period. Should the Lead Agency have any permit related questions concerning this equipment, SCAQMD Engineering and Compliance staff can be contacted at (909) 396-2718.