



South Coast
Air Quality Management District

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FAXED: FEBRUARY 8, 2008

February 8, 2008

Mr. Michael Silverman
City of Los Angeles
Department of Public Works, Bureau of Engineering
1149 South Broadway, Suite 600
Los Angeles, CA 90015

Dear Mr. Silverman:

**Draft Environmental Impact Report (DEIR) for the
Smart Energy Transport System (WesPac)
(SCH No. 2007031007)**

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith., Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS: CB

LAC071214-02
Control Number

**Draft Environmental Impact Report (DEIR) for the
Smart Energy Transport System (WesPac)**

SCAQMD Rule 1166

The DEIR does not provide any specific information about VOC contaminated soil. Rule 1166 – Volatile Organic Compound Emissions From Decontamination of Soil, requires a plan, monitoring and notification for excavation or grading of any soil containing Volatile Organic Materials including gasoline, diesel, crude oil, lubricant, waste oil, etc. and/or any other material containing VOC (see definition (8) in Rule 1166), or for any excavation of an underground storage tank and/or transfer piping storing or previously storing VOC Materials. If VOC Contaminated Soil (measuring > 50 ppm VOC with an OVA, see definition (5) in the rule) is excavated it must be handled and disposed of pursuant to Rule 1166 requirements and conditions of the Rule 1166 Plan. SCAQMD would consider the pipeline project to be one continuous project under Rule 1166 and as such would require a Site Specific Plan if more than 2000 cubic yards of VOC contaminated soil will be excavated for the entire project (the operator could excavate up to 2000 cubic yards of VOC Contaminated Soil with a Various Locations Plan). However, if the project was divided into two separate time periods, SCAQMD staff would consider a proposal for separate plans for the two time periods.

The Rule 1166 plan application package may be downloaded from www.aqmd.gov, using the pathway: Business; Compliance Program; Forms and Information; Forms arranged by rule; Rule 1166

Localized Significance Thresholds (LST) Analysis

The emission rates for the air dispersion model were estimated by dividing the daily emissions by 24 hours and 3,600 seconds per hour. Variable emission rates were then set limiting the emissions to eight hours per day. If variable emission rates are set for only eight hours per day then the emission rate should be estimated by dividing the daily emissions by eight hours and 3,600 seconds per hour. Or, if the emission rates are estimated by dividing the daily emissions by 24 hours and 3,600 seconds per hour, then no variable emission rates should be used. By mismatching the emission rates and variable emission rates, the results in the Draft EIR are reported to be two-thirds too low. The air dispersion modeling should be redone with consistent emission rates and variable emission rates or emission rates are estimated by dividing the daily emissions by 24 hours and 3,600 seconds per hour without variable emission rates in the Final EIR.