South Coast
Air Quality Management District
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Environmental Services
Los Angeles Department of Water and Power
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Draft Environmental Impact Report (Draft EIR) for the Proposed Haynes Generating Station Units 5 & 6 Repowering Project (SCH#2005061111)

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 into the Recirculated Draft EIR or Final EIR.

SCAQMD staff identified potentially significant discrepancies in the Draft EIR that require further analysis. These include an incomplete description of potential localized air quality impacts during construction and commissioning, potentially under-reported and significant short term NO_2 impacts during operation, and inconsistencies between the permit application and the Draft EIR. If further analysis of any of these factors reveals significant impacts, then all feasible mitigation measures should be considered in the Recirculated Draft EIR or Final EIR. The comments on the following pages describe these concerns in greater detail.

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 Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – Inter-Governmental Review, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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

cc: Li Chen, SCAQMD

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LAC100127-01
Control Number

Environmental Analysis

1. In the Draft EIR in Chapter 4.0 Environmental Analysis, the lead agency states on page 4.2-6 that there are no schools located within a quarter of a mile of the proposed project site. Upon review, the Rosie the Riveter Charter Public High School appears to be located to the west less than one–quarter mile from the proposed project site. This school site should be included in either the Recirculated Draft EIR or the Final EIR and incorporated in any applicable air quality analysis including the health risk assessment.

Localized Significance Thresholds

2. Although the lead agency evaluated localized operational air quality impacts, the SCAQMD staff requests that the lead agency also evaluate the project's localized construction air quality impacts to ensure that nearby sensitive receptors are not adversely impacted by the construction activities that would occur at the project site. SCAQMD staff notes that on page 3-2 and in Exhibit 3-2 that sensitive receptors (i.e., residential developments) are located along the entire eastern boundary, to the south, and to the northeast of the proposed project site. The SCAQMD's guidance for performing a localized air quality analysis is available at the following web address: http://www.aqmd.gov/ceqa/handbook/LST/LST.html.

   In the event that the lead agency's localized air quality analysis requested above demonstrates that any criteria pollutant exceeds SCAQMD's localized significance threshold, the SCAQMD staff recommends, that, if feasible, the lead agency consider the mitigation measures found at the following website: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

3. The background air quality data presented in Table 4.4-2 presents the observed air concentrations from years 2005 through 2007. This table should be updated to include the most recent three years of data available, 2006-2008.

4. Potential localized effects from commissioning activities are presented in the Draft EIR for NO_2 and CO, but not for PM_{10} or $PM_{2.5}$. Localized impacts from particulate matter emissions during commissioning should be analyzed in the Recirculated Draft EIR or Final EIR.

Potential Export and Disposal of Contaminated Soils

5. On page 3-5, the lead agency states that existing aboveground tanks formerly utilized to store fuel oil will be dismantled prior to project construction. SCAQMD staff is concerned that this demolition project may have never undergone CEQA review pursuant to §15378 of the CEQA guidelines. Potential emissions from this activity include diesel exhaust from heavy duty construction equipment and trucks, fugitive dust from demolition activity, and release of volatile organic compounds from

potentially contaminated soils surrounding the tanks. An analysis of these potential emissions should be included in the Final EIR either as a part of the project, or as a cumulative impact. In addition, potential cumulative impacts from the Studebaker LB, LLC Tank Removal Project (MND 15-09, City of Long Beach) occurring less than one-quarter mile to the west should be addressed in either a Recirculated Draft EIR or in the Final EIR.

6. On page 3-19 of the project description in the Draft EIR, the lead agency states that fuel oil tanks located on the project site will be demolished and the associated berms will be removed prior to project. A description of potential soils contamination is not included in the Hazards and Hazardous Materials section of the Draft EIR. In the event that any potential excavation activities disturb soil that has the potential to be classified as a hazardous waste, (e.g., petroleum hydrocarbons, etc.) contaminated sites would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil and that compliance should be referenced in the Final EIR.

Dispersion Modeling

7. On Page 36, Table 4.2-16 of the Air Quality Study, the stack parameters shown in this table for the Internal Combustion Engines (ICE) do not match the modeled stack parameters in the electronic input and output files provided. In the Final EIR, the table or modeling should be revised to reflect the correct parameters for the ICE.

8. The project impacts from the 1-hour NO_2 modeled scenario in the Draft EIR may have been under-estimated. The worst-case 1-hour nitrogen dioxide (NO_2) scenario modeled in the permit application consisted of 35 minutes of startup emissions and 25 minutes of normal operating emissions, compared to 20 minutes of startup and 40 minutes of normal operations modeled in the Draft EIR. Therefore, the emission rate of 5.235 grams per second used in the permit application is higher than the emission rate of 3.33 grams per second used in the Draft EIR, yielding a potential under-estimation of NO_2 impacts. In the Recirculated Draft EIR or Final EIR, modeling should be revised to be consistent with the emission rate used in the permit application or an explanation should be provided for this discrepancy.

9. In Table 4.4-18 (Air Quality Impact Modeling Results) of the Draft EIR, the reported background concentration of 37 micrograms per cubic meter ($\mu g/m^3$), or 0.02 parts per million (ppm), for NO_2 is incorrect. For 2005-2007, the maximum NO_2 background concentration was 263.2 $\mu g/m^3$ (0.14 ppm), as reported in Table 4.4-2. When added with the project's maximum predicted impact, the total would be 460.84 $\mu g/m^3$ (0.24 ppm), which would exceed the current California Ambient Air Quality Standards (CAAQS) of 0.18 ppm and result in a significant impact.

The project team expressed in a phone call with SCAQMD staff that the 37 $\mu g/m^3$ cited in Table 4.4-18 was the ambient value of NO_2 for the highest modeled hour of operational emissions. This methodology is not consistent with SCAQMD methodology as it may under-report potential worst case conditions. For example, the highest NO_2 ambient concentration for the period 2005-2007 is 0.14 ppm. Project operational impacts that contribute only 0.04 ppm or greater at this time would present an exceedance of the CAAQS.

Please revise the table in the Recirculated Draft EIR or Final EIR with the correct background concentration and reconsider the significance determination. In light of this significant new information, all feasible mitigation measures should be explored to reduce this impact should it remain significant.

10. The project impacts from the annual NO_2 modeled scenario in the Draft EIR are potentially under-estimated. Although the description of the worst-case annual NO_2 scenario modeled in the Draft EIR matches that of the permit application, the emission rate of 1.828 grams per second used in the permit application is higher than the emission rate of 1.46 grams per second used in the Draft EIR, yielding a potential under-estimation of NO_2 impacts. In the Recirculated Draft EIR or Final EIR, modeling should be revised to be consistent with the emission rate used in the permit application or an explanation should be provided for this discrepancy.

11. The project impacts from the 8-hour carbon monoxide (CO) modeled scenario in the Draft EIR were likely over-estimated. The worst-case 8-hour CO scenario modeled in the permit application consisted of two startup and two shutdown events, compared to three startup and two shutdown events modeled in the Draft EIR. Therefore, the emission rate of 2.872 grams per second used in the permit application is lower than the emission rate of 3.18 grams per second used in the Draft EIR, yielding a potential over-estimation of CO impacts. In the Recirculated Draft EIR or Final EIR, modeling should be revised to be consistent with the emission rate used in the permit application or an explanation should be provided for this discrepancy.

Health Risk Assessment (HRA)

12. The diesel fuel storage tank parameters used in the HRA modeling were not listed in the Air Quality Study. Please include a table in the Air Quality Study which summarizes the modeled parameters for the tank.

13. On Page 28, Table 4.2-5 of the Air Quality Study, the polycyclic aromatic hydrocarbons (PAHs) are speciated, which is consistent with the approach in the HRA submitted with the permit application. However, in the Hot Spots Analysis Reporting Program (HARP) model run, the PAHs were not speciated. Benzo(a)anthracene was not listed as a Toxic Air Contaminant in the HRA submitted

for the permit application. In the Final EIR, the HARP model run should be revised with the speciated PAHs or an explanation provided for this discrepancy.