



# South Coast Air Quality Management District

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**FAXED: SEPTEMBER 15, 2005**

September 15, 2005

Ms. Karen Hoo  
Los Angeles World Airports  
Long Range Planning Department  
7301 World Way West, Room 308  
Los Angeles, CA 90045-5803

**Project-Level Tiered Draft Environmental Impact Report for  
South Airfield Improvement Project, Los Angeles International Airport (LAX)  
Proposed LAX Master Plan project  
(August 2005)**

Dear Ms. Hoo:

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 Project Environmental Impact Report.

The SCAQMD needed an additional day to provide comments because the underlying air quality related spreadsheets were not provided with the draft document, which delayed staff review. For all future projects, please provide all technical support documents and spreadsheets (electronic versions) along with the draft CEQA documents.

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 Project Environmental Impact Report. The SCAQMD would be happy 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, CEQA Section  
Planning, Rule Development & Area Sources

Attachment  
SS:CB  
LAC050802-09 Control Number

**South Airfield Improvement Project Environmental  
Impact Report (SAIPEIR)  
(August 2005)**

1. **MM-AQ-3:** On page IV-113 of the SAIPEIR, the lead agency identifies LAX Master Plan commitments and mitigation measures applicable to the SAIP. Included as part of the discussion is MM-AQ-3: Transportation-Related Measures. The SCAQMD requests that MM-AQ-3 be revised as follows:
  - ~~Developing~~ Requiring program to minimize the use of conventional-fueled fleet vehicles on a permanent basis to reduce air emissions from vehicles at the airport (LAX Master Plan Final EIS/EIR, page 4-727).
  - ~~Promoting~~ Requiring commercial vehicles/trucks/vans/construction worker shuttles using terminal areas (LAX and regional intermodal) to install the cleanest engines available including alternative-fueled and SULEV/ZEV engines to reduce vehicle air emissions (LAX Master Plan Final EIS/EIR, page 4-727).
  - ~~Promoting~~ Requiring “best-engine” technology (SULEV/ZEV) for rental cars using on-airport RAC facilities to reduce vehicle air emissions.
  
2. **Constriction Mitigation Measure:** In order to further reduce construction emissions, SCAQMD staff recommends that the lead agency revise the following recommended measure to increase effectiveness:
  - In Table 4.3-9, the lead agency proposes to prohibit construction vehicles idling in excess of ten minutes. This measure should be revised to prohibit construction (heavy-duty) vehicles from idling more than five minutes, to be consistent with state law.
  
3. **Control Efficiencies:** In Table 4.3-8 on page IV-114 of the SAIPEIR and the mitigation measure spreadsheet in the construction emissions workbook in the file Construction Emissions\_final(PM2.5).xls (provided separately from the SAIPEIR), the lead agency applies a control efficiency of 24 percent for NO<sub>x</sub> and 85 percent for PM10. Emulsified diesel fuels for mobile sources, e.g., Lubrizol, only have interim verification status with a NO<sub>x</sub> control efficiency of 14 percent and a PM10 control efficiency of 63 percent. Even assuming a control efficiency of five percent for keeping engines tuned up, the NO<sub>x</sub> and PM10 control efficiency for off-road mobile sources is too high. Please explain or correct this apparent discrepancy.
  
4. **Additional Mitigation Measures:** Although the emission reduction capability of the following mitigation measures may not be easily quantified, the lead agency should consider implementing them wherever feasible.
  - To reroute truck traffic to avoid residential areas or schools.

- Trucks hauling dirt, sand, gravel or soil are to be covered or shall maintain at least two feet of freeboard in accordance with the requirements of Section 23114 of the California vehicle Code.
- To sweep nearby or adjacent streets at the end of the day if visible soil material is carried over from the construction site.
- To provide temporary wind fencing around the construction sites to prevent transport of dust to the surrounding areas during grading or site clearing.
- To install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off tires of vehicles and any equipment leaving construction site.
- Reduce area graded to no more than five acres per day.

## 5. **Health Risk Assessment**

- It is unclear from the discussion in the Draft EIR whether carcinogenic risk from worker receptors were estimated as residential receptors, which is conservative; or if carcinogenic risk from worker receptors was not reported. The Final EIR should either include a statement that declares that carcinogenic risk from worker receptors were estimated as residential receptors, if this was done; or include risk for worker receptors.
- The Draft EIR estimates risk for four receptor types, namely child resident, school child, adult + child and adult resident. On page IV-134, the Draft EIR states that “incremental MEI cancer risks and non-cancer health hazards were calculated for adult residents, residential children ages zero to six years, and for elementary-aged school children at fence line locations where maximum air concentrations for TACs were predicted. Table L.3-1 presents concentrations and risk values for residence and school locations.
- The carcinogenic risk value estimated for the school child was calculated with an averaging time of 25,550 days, which is inconsistent with the averaging time of 2,190 days displayed on the top of Table L.3-1 and used in the hazard quotient estimates.
- Adjustments are allowed by SCAQMD for workers (i.e., a 40-year adjusted exposure based on working eight hours per day, 240 days per year). No other adjustments are acknowledged by SCAQMD for significance determination. Therefore, all receptors used for significance determination in the Final EIR must be modeled as either a residential receptor, which would include students or residential children receptors; or as an occupational receptor.
- Appendix L includes risk estimates for construction and operational activities. Carcinogenic risk is estimated over an exposure duration, as stated earlier, SCAQMD only recognizes a 40-year adjusted exposure duration for workers and a 70-year exposure duration for residential receptors. Since the construction period for SAIP is proposed to be 1.5 years in duration, an analysis of carcinogenic risk from construction operations related to the SAIP may not have noteworthy meaning. However, the risk from all construction completed under the LAX Master Plan has more meaning because the total duration of all construction associated with the LAX

Master Plan would occur over a substantially longer period of time. A discussion of the risk to receptors from SAIP as a portion of the total risk from all construction under the Master Plan appears to be a more appropriate analysis to be presented in the Final EIR.

- The Air Quality Section and Appendix L include risk estimates for construction and operational activities. A summary table that includes both the construction and operational noncarcinogenic chronic risk should be included in the Final EIR for ease of reference.
  - The Final EIR should also include a map of the proposed project and surrounding area that includes receptors, sources and identifies the MICR and receptors with the highest hazard indices.
  - The mass GLC scaler presented in the carcinogenic and chronic construction risk tables in Appendix L (Tables L-4.2 and L-4.3) do not appear to match the mass GLC scaler in the AERMOD diesel output file provided to SCAQMD separately from the Draft EIR. The mass GLC scaler used for risk calculations should be consistent with those in the AERMOD diesel output file. The Final EIR should include risk developed from the concentrations estimated by AERMOD.
6. **CO Hot Spots:** Although CO concentrations were estimated from on-site using AERMOD, the DEIR does not include a discussion on CO hot spots. The Final EIR should contain a discussion of Co hot spots.