

April 12, 2021

Samantha Bricker
Chief Sustainability & Revenue Management Officer
Los Angeles World Airports
1 World Way
Los Angeles, CA 90045

Dear Ms. Bricker,

This letter is in response to your letter dated February 26, 2021 requesting for confirmation that the anticipated emissions from the Los Angeles International Airport Airfield and Terminal Modernization Project (ATMP) are within the Air Quality Management Plan (AQMP)/State Implementation Plan (SIP) emissions budget for general conformity purposes.

The general conformity determination process is intended to demonstrate that a proposed Federal action will not: (1) cause or contribute to new violations of a national ambient air quality standard (NAAQS); (2) interfere with provisions in the applicable SIP for maintenance of any NAAQS; (3) increase the frequency or severity of existing violations of any standard; or (4) delay the timely attainment of any standard. As such, for general conformity determination, the proposed federal action needs to conform to the latest approved SIP/AQMP.

The South Coast Air Basin (Basin) is designated as an extreme non-attainment area for ozone, serious non-attainment for PM_{2.5} and maintenance area for Carbon Monoxide. In order to accommodate projects subject to general conformity requirements and to streamline the review process, general conformity budgets for NO_x and VOC emissions are established in the AQMP. The 2016 AQMP (<https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>), which is the latest plan approved by U.E. EPA, established set aside accounts to accommodate emissions subject to general conformity requirements. The set-aside accounts include 2 tons per day (tpd) or 730 tons per year (tpy) of NO_x and 0.5 tpd or 182.5 tpy of VOC each year starting in 2017 through 2030, and 0.5 tpd (182.5 tpy) of NO_x and 0.2 tpd (73 tpy) of VOC each year in 2031 and thereafter.

The anticipated emissions from the proposed project exceed the General Conformity de minimis thresholds of NO_x, VOC and CO in years 2023 and 2024 as indicated in Table 3-6, Proposed Project Direct and Indirect Emissions Through 2033, of your letter. These emissions are from construction equipment and increased aircraft taxi time associated with delay due to construction

activities. Los Angeles World Airports (LAWA) has indicated that detailed information on emissions calculations (source inputs, assumptions and emission results) included in the general conformity analysis are available on LAWA's ATMP project website (<https://www.lawa.org/atmp/documents>)¹.

South Coast AQMD staff has reviewed the proposed project emissions and determined that NOx and VOC emissions above de minimis thresholds can be accommodated within the general conformity budgets established in the 2016 AQMP. The emissions accommodated in the general conformity budgets for 2023 and 2024 are listed in Table 1 below. Table 2 shows the annual average operating day emissions converted from annual emissions using the number of days expected to occur for each construction segment and its impact on increased aircraft taxi time (Table 5-1 of your letter).

Table 1. Proposed Project Emissions Accommodated in 2016 AQMP General Conformity Budgets (tons per year)

Pollutants	Emission Phase	2023	2024
NOx	Construction	53.0	58.0
VOC	Construction	25.0	27.0

Table 2. Annual Average Operating Day Emissions from the Proposed Project Accommodated in 2016 AQMP General Conformity Budgets (tons per day)

Pollutants	Emission Phase	2023	2024
NOx	Construction	0.353	0.376
VOC	Construction	0.172	0.181

In addition to NOx and VOC emissions, CO emissions are also anticipated to exceed the de minimis threshold in 2023 and 2024. However, the results of the air dispersion modeling included in your request letter indicate that the increased emissions from the construction phase would result in ground level concentrations not exceeding the NAAQS, as shown in Attachment 5 of your request letter. Therefore, even though CO emissions are above the *de minimis* threshold, the project is not expected to interfere with the CO maintenance status of the Basin. LAWA has indicated that detailed information on CO emissions calculations, including the emission source

¹ Available under National Environmental Policy Act (NEPA) documents at <https://www.lawa.org/atmp/documents>. Refer to page 8 of LAWA's request letter for detailed instructions to access data.

inputs to the dispersion model during construction, and CO modeling results as well as the dispersion modeling protocol are available at LAWA's ATMP website².

In summary, based on our evaluation, the proposed project will conform to the latest EPA approved AQMP as the emissions from the project are accommodated within the AQMP's emissions budgets, and the proposed project is not expected to result in any new or additional violations of the NAAQS or impede the projected attainment of the NAAQS.

If you have any questions, please contact me at (909) 396-2856 or srees@aqmd.gov or Sang-Mi Lee, Program Supervisor at (909)-396-3169 or slee@aqmd.gov.

Sincerely,

Sarah Rees

Sarah L. Rees, Ph.D.
Deputy Executive Officer
Planning, Rule Development & Area Sources
South Coast Air Quality Management District

Attachment:

Letter from Los Angeles World Airports dated February 26, 2021

cc: Tom Kelly, US EPA Region IX
Rongsheng Luo, SCAG
Barbara Baird, South Coast AQMD
Zorik Pirveysian, South Coast AQMD
Sang-Mi Lee, South Coast AQMD
Jillian Wong, South Coast AQMD
Lijin Sun, South Coast AQMD

ZP:SL

² Available under CEQA Environmental documents at <https://www.lawa.org/atmp/documents>. Refer to page 16 of LAWA's request letter for detailed instructions to access data.