



# South Coast Air Quality Management District

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**FAXED: AUGUST 15, 2006**

August 15, 2006

Ms. Stephanie Lewis  
Los Angeles Unified School District  
Schools Unit – Glendale Office  
1011 North Grandview Avenue  
Glendale, CA 91201

Dear Ms. Lewis:

**Draft Supplemental Environmental Impact Report (DSEIR) for  
Central Los Angeles Area New Learning Center No. 1  
June 2006**

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 Supplemental 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 Supplemental Environmental Impact Report. The SCAQMD would be willing 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  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS: CB  
LAC060705-06  
Control Number

**Draft Supplemental Environmental Impact Report (DSEIR) for  
Central Los Angeles Area New Learning Center No. 1**

1. **Section 3.4.3 – SCAQMD Rule 102:** For clarification, please note that both methane and hydrogen sulfide are air contaminants as defined in SCAQMD Rule 102 – Definition of Terms.
2. **Section 4.2 – Subsurface Gas Mitigation System:** The air sweep system described in Chapter 4, an active system consisting of collection pipes with one or more blowers and stacks, will result in the emissions of air contaminants. This air sweep system will be subject to SCAQMD Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, Regulation XIII – New Source Review, and Rule 1401 – New Source Review of Toxic Air Contaminants. The evaluation of the applications for permits will determine whether emissions controls are required.
3. **SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil:** According to the lead agency, the Human Health Screening Evaluation (HHSE) revealed that there were chemicals of concern, carcinogens and non-carcinogens, in the soil samples. Although these chemicals were not identified in the DSEIR, they may also be volatile organic compounds (VOCs), subject to SCAQMD regulation including Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Should the construction activities encounter soils containing volatile organics, the requirements of this rule would be applicable.
4. **Project Construction Emissions:** On page ES-7 of the DSEIR, the lead agency states that construction NO<sub>x</sub> and VOC emissions will be significant as noted in the 2004 FEIR. According to the lead agency, “the only change in impacts would be the extension of activities... and these would be within the range of alternatives analyzed in the 2004 EIR.” Further, the lead agency states on page ES-7 of the DSEIR that should off-site disposal of hazardous materials become necessary during construction, the removal and disposal of 650 cubic yards of petroleum-contaminated dirt would require 45 additional truck loads transporting the contaminated soil over 100 miles, some of which would occur in the South Coast Air Basin.

Since the lead agency does not quantify air quality impacts from construction activities associated with installation of the subsurface gas mitigation system, the SCAQMD cannot verify the assertion on page 5-2 that construction emissions would not change from what was analyzed in the 2004 EIR.

Similarly, the lead agency did not quantify emissions from the possibility of the proposed project generating 45 additional truck loads of petroleum contaminated soil requiring disposal 100 miles away in Kern County. On page 5-3 the lead agency states that the “emissions would add incrementally to the quarterly average emissions used to evaluate project significance.” Since truck emissions were not quantified, it is unclear what constitutes incremental emissions. In addition, there appears to be no discussion of how these emissions compare to the daily construction significance thresholds.

The SCAQMD, therefore, requests that emissions from construction of the subsurface gas mitigation system and emissions from the haul truck trips be quantified, summed if they overlap, and compared to peak daily construction impacts identified in the 2004 EIR. If impacts from the currently proposed project substantially exceed the construction impacts identified in the 2004 EIR, additional mitigation measures may need to be identified.