



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: March 2, 2006

March 2, 2006

Mr. Jawahar P. Shah
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
City of Los Angeles
2714 Media Center Drive
Los Angeles, CA 90065

Draft Environmental Impact Report (Draft EIR) for the Proposed Integrated Resources Plan

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 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 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 – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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

Attachment

SS:GM

LAC051201-01
Control Number

SCAQMD Permit Requirements

1. Wastewater treatment upgrades/expansions involving new equipment and structures would trigger pre-construction permit review for compliance with AQMD Regulation XIII, including BACT, and Regulation XIV, including TBACT.
 - Hydrocarbon emissions increases at Hyperion/Tillman/LA Glendale may require additional treatment equipment to be installed along with the proposed odor control device upgrades and new installations. In addition to carbon adsorption, LA City should consider biological treatment of hydrocarbons.
 - Emissions from the installation of primary clarifiers at Tillman's and LA-Glendale's proposed expansions will require covers and venting to control.
2. Temporary releases of emissions and odors during construction, including water and gas conveyance tie-ins, should be minimized to the maximum extent by use of scheduling and odor control equipment. Releases of untreated digester gas from in-plant sources are not allowed under current permits to construct and operate.
3. Sewer interceptor realignments may require temporary odor control equipment during construction and E&C encourages LA City, wherever feasible, to schedule and engage in construction activities and to locate odor control equipment with a consideration for odor minimization with respect to neighboring commercial, residential, and other sensitive receptors.