



South Coast Air Quality Management District

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

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Ms. Hoan Tang, CEQA Project Manager/Consultant
Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West Seventh Street, 9th Floor
Los Angeles CA 90017

Recirculated Draft Environmental Impact Report (Draft EIR) for the Proposed South Region High School No. 4

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 Recirculated Environmental Impact Report (EIR). The SCAQMD previously submitted comments on the ongoing Draft EIR, which are attached and incorporated to herein by reference.

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

LAC070220-03
Control Number

Health Risk Assessment

1. SCAQMD staff previously requested that LAUSD staff provide a list of facilities that were surveyed and not included in the HRA in a May 26, 2006 letter to Ms. Jessica Rappaport. SCAQMD staff requested this information, because the aerial photo of the school site appeared to show several large unidentified facilities large enough to be industrial or warehouse operations, which often have high volumes of heavy-duty diesel truck trips. The SCAQMD again requests to be provided with a list of facilities surveyed and excluded from the HRA for this project and all future LAUSD projects for which an HRA has been performed. The list should include a description of the excluded facility, address and reason for exclusion from the HRA.
2. In the emission calculation worksheets, the hourly primer usage for Site 4 is listed as zero (0.0), whereas the monthly usage for this coating at this site is listed as 0.75 gallon. Similarly, in the emission calculation worksheets, the hourly top coat usage for Site 12 is listed as zero (0.0), whereas monthly usage for this coating at this site is listed as 20 gallons. Since usages are directly tied to emissions and health risk, the HRA in the Final EIR should have consistent monthly and hourly usages.
3. Based on the plot plan and air dispersion model file for Site 12, the area source representing coating operations was given as the dimensions of the total property. Emissions from area sources are divided over the entire area of the source; therefore, the larger the area the greater the initial dispersion. It appears from the plot plan for Site 12 that the container repair area is located on the south side of the property. To be conservative, the actual coating area (meters squared) should be used in the air dispersion model for the Final EIR when estimating emissions flux from coating operations rather than the total site area.
4. Diesel truck idle times at all facilities in the HRA were estimated to be five minutes per trip per facility. Five minutes is the maximum time allowed by state regulation for a single idling event. However, since trucks may idle at an entrance gate, while waiting for a loading dock, at the loading dock before loading, at the loading dock after loading and again before checking out, SCAQMD staff believes that each diesel truck would idle at least 15 minutes at on-site warehouses or similar facilities. For example, facilities that house diesel truck fleets are expected to have similar idling times as trucks enter, fuel, wash, park and exit. The Final HRA should provide the rationale for diesel truck idling times. SCAQMD staff suggests a default 15 minute idling times for warehouse type projects, if facility-specific information is not available.
5. In the health risk summary tables for school staff (Table A1) and students (Table A2), the health risk from diesel exhaust particulate sources are not listed individually (e.g., Long Beach Unified SD, James Brooks Trucking, UPRR Line Haul, UPRR idle, I-710 Diesel, etc.), but are aggregated into a single source (All Diesel Sources). The health risk for each individual source is not identified (i.e., left blank in the spreadsheet). In previous LAUSD reports, health risk from each source is presented

individually. Since individual health risk is not presented for each source, it is unclear which sources contribute the greatest health risk to the schools. On page 3B-12, a 70-foot setback on the southern boundary of the project is proposed as mitigation, but it is not clear why this mitigation measure is appropriate. However, it would be more apparent if the individual health risk from James Books Trucking and the Direct Terminal (which are directly south of the proposed project) were presented in Tables A1 and A2. The individual health risk should be presented for each source in Tables A1 and A2 in the Final HRA in the Final EIR, so that the public is afforded the opportunity to evaluate the effectiveness of the mitigation measures and the basis for selecting the mitigation measures.

6. Mitigation measures are present in the Recirculated Draft EIR on page 3B-12; however, no explanation of why these mitigation measures are appropriate or why they reduce health risk is provided. Based on the health risk mitigation report, which was not circulated with the Recirculated Draft EIR, the mitigation measures are for diesel exhaust particulate. The Final EIR should explain how the mitigation measures work, what pollutants would be reduced, and how the mitigation reduces health risk. Without this information, it is unclear if the public has enough information to evaluate the mitigation measures.

Health Risk Mitigation

7. LAUSD staff sent SCAQMD staff a health risk mitigation report via e-mail. This report provides information on the effectiveness of the mitigation measure selected by the lead agency. Without this report, the public is not afforded the opportunity to review and comment on the effectiveness of the mitigation measures included in the EIR to reduce carcinogenic health risk to less than the significance threshold of 10 in one million (10×10^{-6}). The health risk mitigation report should have been in the Recirculated Draft EIR and also included in the Final EIR, so that the public can evaluate the mitigation measures.
8. The footprint area of the proposed project in Figures 3B-1 and 3B-1 from the Recirculated Draft EIR, Figure 1 from the health risk mitigation report, and the receptor representation in air dispersion modeling for the HRA appear to differ in area. The project site dimensions should be consistent between the Final EIR, Final HRA and Final health risk mitigation report.
9. The health risk value estimated in the health risk mitigation report is different than the health risk estimated in the HRA. The daily exposure in the HRA is eight hours. The daily exposure in the health risk mitigation report is nine hours. Adjustments to concentrations and breathing rates were made in the health risk mitigation report to convert the health risk exposure from eight to nine hours and split the health risk into indoor and outdoor values. These adjustments are not clearly explained nor is it clear that the adjustments follow ARB or OEHHA guidance. Since the methodology is not clear and appears to be unorthodox, it is not clear that the results are accurate and that mitigation measures reduce health risk to a level that is not significant. To avoid

confusion, SCAQMD staff suggests that LAUSD staff base the HRA and health risk mitigation report on a consistent daily exposure and follow ARB/OEHHA guidance on breathing rates.