



South Coast
Air Quality Management District

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FAXED: SEPTEMBER 28, 2007

September 28, 2007

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

**Draft Environmental Impact Report (Draft EIR) for the Proposed South Region
High School No. 12**

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 AQMD 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
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC070815-07
Control Number

Construction and Operation Analyses

1. The lead agency should be aware that the most current version of the URBEMIS model, URBEMIS2007, was released in September 2007. If the lead agency uses the model for future projects, the SCAQMD recommends that URBEMIS2007 be used.

Acute Risk Assessment

2. The lead agency has provided to SCAQMD staff an acute risk assessment, which was not included in the Draft EIR. The lead agency verbally stated to SCAQMD staff that the acute analysis consisted only of emissions from the John Boyd Design Facility, since the lead agency had determined that most of the acute health risk was generated by that facility. Since the lead agency has generated carcinogenic and chronic health risk values for each facility in the acute risk assessment analysis in the Draft EIR, the lead agency should present the acute risk from each industrial facility used to generate carcinogenic and chronic health risks in the Final EIR to identify the cumulative acute health risk to the proposed school from other industrial facilities.

Odor Analysis

3. In the odor analysis in the Draft EIR, the lead agency did not include calculations in the draft document, but did provide calculations to SCAQMD staff during the public comment period. SCAQMD staff, however, was not able to verify the results of the odor analysis from the materials provided. In the Final EIR, the lead agency should provide detailed documentation that shows how the concentrations were developed.

Odor Mitigation

4. In Appendix E (John Boyd Designs – Environmental Report) of the Draft EIR, carbon filters are proposed as a mitigation measure for minimizing the odorous emissions from the spray booths located at John Boyd Designs. The document indicates that carbon filtration is 95 percent efficient in removing odorous compounds from an exhaust stream. While well designed and operated carbon filtration can effectively control odorous volatile organic compound (VOC) emissions, it is the SCAQMD staff's experience that the carbon containing or impregnated filters that fit within the exhaust filter framework of a spray booth are typically not effective in controlling VOC emissions and their related odors. These carbon filters typically do not contain a sufficient quantity of carbon to handle the VOC mass flow rate generated by the spraying operation. The filters are typically thin resulting in very short retention times, requiring constant replacement. In addition, the VOC impact area on the filters is typically concentrated in the area where the articles are being sprayed so the carbon in this area quickly becomes saturated, loses its adsorption capacity, and breakthrough of VOC emissions occurs.

The lead agency should therefore evaluate the mitigation measure's impact on the lead agency's VOC emission estimates and revise the mitigated VOC estimates in the

Final EIR if this measure does not achieve the 95 percent control efficiency stated in Draft EIR. The lead agency should then evaluate substitute measures to reduce operational VOC impacts to below the SCAQMD daily threshold of significance for VOC.