South Coast
Air Quality Management District
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Mr. Glenn Acosta, Senior Engineer
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of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90607-4998

Draft Negative Declaration (Draft ND) for the Proposed Palos Verdes Gas-to-Energy Facility Phase II

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 Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. 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

LAC070717-01
Control Number

Construction Emissions

1. Exhibits 7 and 8 in the Air Quality study summarized the results of the construction analysis and air toxics analysis. The supporting documentation used to generate the results in Exhibits 7 and 8 was not included in the Draft ND. Upon request, the lead agency provided the supporting documentation used to derive the construction emissions for each phase. Review of the supporting documentation material indicated the following.

   On-road mobile source emission factors used to derive construction worker commute trip emissions are from the SCAQMD's Air Quality Handbook Table A9-5-J4, which are based on EMFAC7EP factors for a 1997 fleet. Comparing these emission factors to the emission factors from EMFAC2007, the most current version of EMFAC, indicates that emissions from construction worker commute trips are slightly over-estimated, which represents a more conservative analysis.

   The supporting documentation also showed that the lead agency used a control efficiency of 45 percent to mitigate construction fugitive dust emissions from water application and limiting travel speeds to less than 15 miles per hour (mph). According to SCAQMD sources[1], watering disturbed areas every 3.2 hours has a control efficiency of 61 percent. Further, limiting on-site speed of vehicles on unpaved roads has a control efficiency of 57 percent.

   Based on the above, the SCAQMD recommends that the lead agency revise the construction worker commute and fugitive dust emission calculations in the Final ND.

Operational Emissions

2. The facility modifications associated with the proposed project, including combustion sources, process equipment and reconfiguration of the gas collection system, may require SCAQMD permit. All new and modified equipment permits will be subject to the applicable requirements of the New Source Review for criteria and toxic air pollutants as well as other rules and regulations that are applicable at the time when permit applications are submitted. The existing leachate/condensate treatment system and contaminated water air stripper system may also be subject to similar permitting requirements if the project would result in physical modification or change in operating conditions of the system."

PM2.5 Analysis

3. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. The Draft ND circulated to the public did not include an analysis of PM2.5 emissions. This information, however, was included with supporting

documentation requested by SCAQMD staff and provided by the lead agency. The supporting data showed that PM2.5 emissions from construction and operation of the project did not exceed significance thresholds.

Health Risk Assessment

4. The ISCST3 model control parameters used in the analysis are not consistent with the SCAQMD's Supplemental Risk Assessment Guidelines. The lead agency's analysis used the regulatory default and implemented calms processing. The SCAQMD Guidelines require no calms processing. The lead agency should revise this portion of the HRA in the Final ND. The SCAQMD's Supplemental Risk Assessment Guidelines are available at the following website: http://www.aqmd.gov/prdas/AB2588/AB2588_B3.html.

5. The SCAQMD Guidance (see comment #4) for Receptor Grid Spacing requires that the peak impacts be identified using a maximum of 100 meter grid spacing. The risk analysis in the Draft ND used 250 meter spacing. The lead agency should revise the grid spacing in the Final ND.

[1]Mitigation efficiencies can be found on the SCAQMD website at: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .