



South Coast
Air Quality Management District

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

E-MAILED: JULY 9, 2009

July 9, 2009

Ms. Gwenn Godek, Senior CEQA Project Manager/Consultant
Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West 7th Street, 9th Floor
Los Angeles, CA 90017

**Recirculated Draft Environmental Impact Report (Draft EIR) for the Proposed
South Region High School No. 9 (SCH No. 2008041065)**

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

Attachment

SS:GM

LAC090528-02
Control Number

Hazards and Hazardous Materials

1. In the Hazards/Hazardous Materials section on pages 3D-2 and 3D-8, the lead agency has determined that the potential soil excavation at the site will include soil that would be classified as a hazardous waste due to the presence of chemicals including petroleum hydrocarbons in the soil. The lead agency is reminded that, if soil is contaminated by hydrocarbon contaminants, contaminated sites would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which, depending on the extent of the soil contamination, may require a VOC soil mitigation plan. Compliance with SCAQMD Rule 1166 should be referenced in the Final EIR.

Health Risk Assessment (HRA)

2. The emissions spreadsheet for Domar Precision, Inc., states that the emission rate (6.3 mg/hr) was developed from source test data. There are emissions rate calculations under the heading “Source Test Results;” however, SCAQMD staff was unable to reproduce the 6.3 mg/hr emission rate used in the analysis using these calculations. Therefore, it is unclear how the emission rate was developed. In addition, no reference or other information is provided for the source test, so SCAQMD staff could not confirm the source test result(s). The Final HRA should include a reference for the source test(s) and detail how the emissions rate used to estimate emissions from Domar Precision was developed from the source test(s).
3. SCAQMD staff has identified two issues associated with the I-710 analysis portion of the HRA. First, there is no documentation regarding how the truck trip rate was derived. Second, the emission rate from the I-710 freeway was calculated incorrectly.. According to the HRA, the link length used in the analysis is 107 meters, which is the distance between two adjacent volume sources. The emission rate between the adjacent volume sources (0.00457 gram per second) was then divided by 12, the total number of volume sources, resulting in an emission rate per volume source of 0.000381 gram per second.

There are two approaches that can be used to derive appropriate emission rates. The first approach is to calculate an emission rate for the entire link length of 1,177 meters, which is the distance between the first volume source and the 12th volume source. The resulting emission rate for the entire link length is 0.05 gram per meter (0.00457 gram per meter per link x 11 links). Alternatively, an emission rate per volume source can be used. The volume source emission rate would be 0.00419 gram per meter per volume source (0.05 gram per meter divided by 12 volume sources).

SCAQMD staff requests that the lead agency rerun the HRA, incorporating the correct emission rates identified above and include the revised result in the Final EIR. If the revised analysis shows cancer risks exceeding 10 in one million (10×10^{-6}), feasible mitigation measures should be identified as required by CEQA. If no mitigation measures are identified or the identified mitigation measures do not reduce

impacts to less than significant, the significance determination must be revised. Finally, SCAQMD staff requests the HRA tables “Quantification of Carcinogenic Risks and Noncarcinogenic Hazards Administrative Staff Scenario” and “Quantification of Carcinogenic Risks and Noncarcinogenic Hazards Student Exposure Scenario” be incorporated into the Final EIR.