



# South Coast Air Quality Management District

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E-MAILED: APRIL 29, 2010

April 29, 2010

Mr. Larry Eisenberg, Executive Director  
Facilities Planning and Development  
Los Angeles Community College District  
770 Wilshire Boulevard, 6<sup>th</sup> Floor  
Los Angeles, CA 90017

## **Draft Supplemental Environmental Impact Report (Draft SEIR) for the Proposed East Los Angeles College Facilities Master Plan Update**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document, including with an extended review period. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Supplemental Environmental Impact Report.

In the operational air quality analyses in the Draft SEIR, the lead agency does not detail the emissions for the proposed central plant facility boilers and micro-turbines or describe the methodologies, equations and emission factors used to estimate these long-term air quality impacts. If these emissions were estimated but not carried forward from the Final EIR or FEIR Addendum, this information should be included in the Final SEIR. Further, potential toxic air contaminant emissions from this combustion source are not discussed in the air quality section. A Health Risk Assessment may be necessary to determine potential impacts from this operation. Further discussion regarding the quantification of air quality impacts should be presented in the Final SEIR.

Permits may also be required based on the size of each boiler or micro-turbine under AQMD Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II and Rule 222 - Filing Requirements For Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II. Compliance with AQMD Rules 219 and 222 should be referenced in the Final SEIR. Questions regarding permit requirements can be referred to engineering and compliance staff at (909) 396-2601.

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. If you have any questions regarding these comments, please contact Ian MacMillan, Program Supervisor – Inter-Governmental Review, at (909) 396-3302.

Mr. Larry Eisenberg

April 29, 2010

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:GM

LAC100304-02  
Control Number

### **Air Quality – Operations**

1. In the air quality analysis under operations in Table 4.2-8: Daily Operational Emissions, it is not clear if these emissions include the air quality impacts from the boilers and micro-turbines mentioned in the project description and on page 4.2-28 in the air quality section. If these estimates were brought forward from the original Final EIR or Final EIR Addendum and included in the Draft SEIR, then it would be clearer if those emissions could be detailed in the Final SEIR, perhaps by expanding the operational emissions tables. The expanded discussion should include a description of the methodologies, emission factors, equations, etc., used to estimate those emissions.

### **Toxic Air Contaminants**

2. Toxic air contaminants emitted from the boilers and turbines are not discussed on page 4.2-23 (Toxic Air Contaminant Impacts) of the Draft SEIR. A more detailed discussion of air quality impacts from these sources should be presented in the Final SEIR. A Health Risk Assessment (HRA) may be necessary to determine if toxic air contaminant impacts from these combustion sources will be significant.

### **Permits for Central Plant Facility Equipment**

3. In the project description on page 4.2-28 in the air quality section, the lead agency describes boilers and micro-turbines for the proposed central plant facility. Based on the BTU per hour for each of the boilers and micro-turbines, the units may be subject to AQMD Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II and Rule 222 - Filing Requirements For Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II and that compliance should be referenced in the Final SEIR. Questions regarding permit requirements can be referred to engineering and compliance staff at (909) 396-2601.