South Coast
Air Quality Management District
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Notice of Preparation (NOP) of the Draft Environmental Impact Report (draft EIR) for the Hyperion Digester Gas Utilization Project

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 AQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft program environmental impact report (draft EIR). Please send the AQMD a copy of the draft EIR upon its completion. Note that copies of the draft EIR that are submitted to the State Clearinghouse are not forwarded to the AQMD. Please forward a copy of the draft EIR directly to AQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the AQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Project Background

The proposed project consists of the installation and operation of a digester gas/natural gas-fueled combined cycle cogeneration system at the Hyperion Treatment Plant located in the City of Los Angeles adjacent to the City of El Segundo and 500 feet east of the Pacific Ocean. The project will combust digester gas from the plant to generate electricity, recover heat to generate steam, generate power from a steam turbine generator and extract a portion of the steam

generated to meet the steam demand of the digesters. The proposed project is intended to provide maximum utilization of digester gas on-site and produce electricity.

Air Quality Analysis for the Proposed Project

The AQMD adopted its California Environmental Quality Act Air Quality Handbook (CEQA Handbook) in 1993 to assist other public agencies with the preparation of air quality analyses. The AQMD recommends that the lead agency use the CEQA Handbook as guidance when preparing its air quality analysis. Copies of the CEQA Handbook are available from the AQMD's Subscription Services Department by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as URBEMIS 2007 or the recently released CalEEMod.[1]

The lead agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The AQMD has developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the AQMD has also developed both regional and localized significance thresholds. The AQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the AQMD Website.[2]

In addition to analyzing regional air quality impacts the AQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can also be found at the AQMD Website.[3]

[1] http://www.aqmd.gov/ceqa/models.html
[2] http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html
[3] http://www.aqmd.gov/ceqa/handbook/LST/LST.html

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the AQMD's CEQA web page.[4] An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

Given that the proposed project may generate a significant amount of criteria pollutant emissions during operations (based on estimated emissions concentrations provided in Table 1-3 of the NOP) the AQMD staff requests that the lead agency minimize the projects air quality impacts to avoid significant air quality impacts. In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be implemented during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the AQMD's CEQA web page.[5] Additionally, AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the AQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.[6] In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective.[7] CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

AQMD rules and relevant air quality reports and data are available by calling the AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available online at: http://www.aqmd.gov.

[4] http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html
[5] www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html
[6] http://www.aqmd.gov/prdas/aqguide/aqguide.html
[7] http://www.arb.ca.gov/ch/handbook.pdf

The AQMD is willing to work with the lead agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,

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

IM:DG

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