



South Coast Air Quality Management District

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<http://www.ssflareaiveis.com/comment.aspx>

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Draft Environmental Impact Statement (DEIS) for Remediation of Area IV and the Northern Buffer Zone of the Santa Susana Field Laboratory (Draft SSFL Area IV EIS) (DOE/EIS-0402) (SCH No.: 2017014002)

The South Coast Air Quality Management District (SCAQMD) staff 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 EIS.

SCAQMD's 2016 Air Quality Management Plan

Adopted on March 3, 2017, the 2016 Air Quality Management Plan (2016 AQMP) is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment. For more information on the 2016 AQMP, please visit the SCAQMD's website, at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

Proposed Action

The proposed action consists of the remediation of impacted soil and groundwater, the removal of existing facilities, the disposal of resulting waste, and the restoration of the affected environment in Area IV of the Santa Susana Field Laboratory (SSFL) in Ventura County. The 290-acre Area IV is bounded by the 182-acre buffer zone to the north and the 114-acre Area III to the south. Boeing is the owner of Area IV, Area III, and the northern buffer zone area, while U.S. Department of Energy ("DOE" or "Lead Agency") owns the existing buildings in Area IV and is responsible for building demolition and cleanup of soils and groundwater in Area IV. Contaminated soils and resulting waste would be hauled by trucks traversing through Woolsey Canyon Road to nearby (Buttonwillow or Westmorland facilities in California) and distant (Nevada National Security Site or U.S. Ecology in Idaho) disposal sites. The proposed action is expected to occur over a 15-year period.

Air Quality Analysis

Based on a review of Tables 4-37 and 4-38 in Chapter 4.6, *Air Quality and Climate Change*, of the DEIS, the SCAQMD staff found that the unmitigated peak NO_x emissions generated by truck travelling between SSFL and the nearby disposal sites would be within a range of 47 to 70 pounds per day or 10 to 250 tons per year, and disposing at the distant disposal sites would generate 110 to 140 pounds per day or 25 to 250 tons per year of NO_x emissions.

The SCAQMD has developed regional air quality CEQA significance thresholds. Because the proposed construction period would occur over a length of 15 years, it more closely resembles the characteristics of project operation. Therefore, the SCAQMD staff recommends that the Lead Agency quantify the project's criteria pollutant emissions within the South Coast Air Basin and compare the results to the SCAQMD's regional operational thresholds¹ to determine the air quality impacts.

Mitigation Measure

In Chapter 6, *Measures to Minimize Impacts and Mitigation Measures*, on page 6-17 of the DEIS, the Lead Agency is committed to using green fleets which are “a fleet of trucks no more than 5 years old” for on-road trucks (see Mitigation Measure AQ-1 in Table 6-2, *Potential Mitigations*). The Lead Agency found that using green fleets would “reduce emissions from the average calendar year 2019 truck fleet by 61 percent in the South Coast Air Basin” and that “the peak annual truck emissions within the Basin would be below the emission thresholds” (see page 4-86 of the DEIS). Based on the SCAQMD staff's understanding of the description for Mitigation Measure AQ-1, the Lead Agency is committed to using 2019 model year diesel trucks during construction. As stated above, the proposed construction period would occur over a length of 15 years. Assuming that the proposed construction would begin in year 2019, the proposed construction would be completed in year 2034. As such, using 2019 model year diesel haul trucks for construction beginning from year 2025 will not meet the Mitigation Measure AQ-1 requirement, and newer diesel haul trucks will be required (see Table 1). The SCAQMD staff recommends that the Lead Agency specify which model year haul trucks will be used during construction in the Final EIS.

Table 1

Construction Years	Model Year Diesel Haul Trucks Based on the Description of Mitigation Measure AQ-1
2019-2024	2019
2025	2020 or newer
2026	2021 or newer
2027	2022 or newer
2028	2023 or newer
2029	2024 or newer
2030	2025 or newer
2031	2026 or newer
2032	2027 or newer
2033	2028 or newer
2034	2029 or newer

The SCAQMD staff commends the Lead Agency's commitment to using diesel haul trucks newer than 2010 model year. As described in the 2016 AQMP, to achieve NO_x emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. The proposed action plays a role in contributing to Basin-wide NO_x emissions. The Lead Agency's commitment to using green fleets throughout the entire construction phase is consistent with the SCAQMD's commitment to NO_x emissions reductions and ensures that the South Coast Air Basin is on track to attain the NAAQS.

¹ South Coast Air Quality Management District. March 2015. *SCAQMD Air Quality Significance Thresholds*. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Lijin Sun". The signature is written in a cursive, flowing style.

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

JW:LS
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