South Coast
Air Quality Management District
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Notice of Preparation of a Draft Environmental Impact Report for the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

Proposed Project's Objectives

Staff recommends that the Lead Agency thoroughly reassess and redefine the objectives of the Proposed Project. While the pursuit of a 100% carbon-free goal is necessary to address climate change, the goal of reducing emissions of other harmful pollutants such as nitrogen oxides (NOx) should not be overlooked. It is essential to strike a balance between these goals, ensuring that the objectives of the Proposed Project align with comprehensive environmental considerations outlined in Los Angeles 100% Renewable Energy Study which prioritizes the reduction of all pollutants to accelerate buildout of sustainable and clean energy future.

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website[1] as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod[2] land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the

[1] South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.

emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds[3] and localized significance thresholds (LSTs)[4] to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed 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, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., turbines, boilers and air pollution control devices), 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, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

CEQA Alternatives Analysis

As noted in our earlier comments relative to the Proposed Project's Objectives, staff recommends that the Lead Agency thoroughly explore alternatives that will achieve the objective of energy reliability through the use of zero emission technologies. The greater Los Angeles area experiences some of the worst air pollution in the nation. Less air polluting alternatives should be closely examined and compared to the Proposed Project. If zero emission alternatives are not feasible, then the public needs to be provided with the analysis showing why.

United States Environmental Protection Agency (U.S. EPA)'s Proposed Carbon Pollution Standards for Fossil Fuel-Fired Power Plants

Depending on the hydrogen technology and operational practices employed by the Proposed Project, the emissions of nitrogen oxides and greenhouse gases (GHGs) could have significant impacts on air quality and climate change. In addition to the compliance of the regulations outlined in South Coast AQMD's Regulations IX - Standards of Performance for New Stationary Sources (NSPS), U.S. EPA has proposed federal Clean Air Act emission limits and guidelines for carbon dioxide from fossil fuel-fired power plants[5]. These proposals aim to establish cost-effective and achievable emission standards based on available control technologies. The limits would apply to new gas-fired combustion turbines, existing coal, oil, and gas-fired steam generating units, as well as specific existing gas-fired combustion turbines. The proposed standards follow U.S. EPA's traditional approach under Section 111 of the federal Clean Air Act, utilizing technologies such as carbon capture and sequestration/storage, low-GHG hydrogen co-firing, and natural gas co-firing. These technologies can be directly applied to power plants that rely on fossil fuels for electricity generation. The proposed new NSPS and emission guidelines align with Section 111 of the federal Clean Air Act, incorporating the best system of emission reduction that is adequately demonstrated for improving the emissions performance of covered electric generating units, while considering factors such as costs, energy requirements, and statutory considerations. Further information

[3] South Coast AQMD's Air Quality Significance Thresholds can be found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.

[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

[5] Docket Numbers: EPA-HQ-OAR-2023-0072

can be found on U.S. EPA's website at: The Lead Agency should include a discussion in the CEQA document to demonstrate how the Proposed Project will comply with the new requirements proposed by the U.S. EPA.

Early Consultation with CEQA Responsible Agency and South Coast AQMD Air Permits

Since implementation of the Proposed Project will require air permits from South Coast AQMD, the CEQA document should identify South Coast AQMD as a Responsible Agency[6] for the Proposed Project. South Coast AQMD's statutory responsibilities under CEQA as Responsible Agency in connection with the Proposed Project are air quality and GHG analyses. As such, the Lead Agency should consult with and involve South Coast AQMD, as Responsible Agency, early on and throughout the CEQA process as set forth in CEQA Guidelines Section 15096.

A Responsible Agency complies with CEQA by considering the CEQA document prepared by the Lead Agency and by reaching its own conclusions on whether or how to approve the project involved. In order for the Responsible Agency to rely upon the Lead Agency's final CEQA document for issuing project approvals, making Responsible Agency Findings, and issuing a Notice of Determination, the Responsible Agency needs to first determine that the CEQA document is adequate for this purpose. With this in mind, the assumptions in the air quality and GHG analyses in the CEQA document will be the basis for evaluating the air permits under CEQA and imposing permit conditions and emission limits. Therefore, in order to ensure that the potential environmental impacts from the air permits are fully and adequately evaluated in the CEQA document for the Proposed Project, the Lead Agency is requested to initiate consultation with South Coast AQMD by contacting Barbara Radlein, Acting Planning and Rules Manager, CEQA via email at bradlein@aqmd.gov or via phone at (909) 396-2716. Questions on air permits should be directed to Li Chen, Supervising Air Quality Engineer, via email at LChen@aqmd.gov or via phone at (909) 396-2426 in South Coast AQMD's Engineering and Permitting Division.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, GHG, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at swang1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SR:MK:BB:ND:BR:SW
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[6] Public Resources Code Sections 20180.3, 21080.4, 21104, and 21153; CEQA Guidelines Sections 15060.5, 15074, 15082(b), 15083, 15086, and 15096(b)(2).