

Comment Set E.5: Applicant – Air Quality

**ANTELOPE-PARDEE 500kV TRANSMISSION PROJECT
 SCE COMMENTS & SUGGESTED REVISIONS ON DEIR/DEIS
 C. 2 AIR QUALITY**

October 2006

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
1	C.2.5	C.2-23	Mitigation Measure A-1a	Mitigation Measure A-1a requires use of "CARB certified" soil binders. As of this date, CARB has issued pre-certifications to only two dust suppressant products. CARB personnel have indicated that there are no pending applications by other companies for dust suppressant certifications. Thus, complying with the proposal in the EIR/EIS would limit the choice to just two products. The EPA's Environmental Technology Verification program has reviewed performance of a longer list of dust suppressant products. The reports are available at http://www.epa.gov/etv/verifications/vcenter5-7.html . In addition, the SCAQMD routinely observes the performance of various products used within their jurisdiction. The SCAQMD does not provide formal certification of products, but does collect a list of products which in the opinion of the inspectors, demonstrate compliance with dust control rules. Thus, the restriction in Measure A-1a to the use of just two products is puzzling and unnecessary.	Mitigation Measure A-1a should be modified to give SCE or its contractors the flexibility to choose the best product available drawing upon their experience with similar projects in the SCAQMD area. SCE suggests that A-1a, bullet point 3 be reworded as follows - "Non-toxic dust suppressant products shall be used on unpaved roads in sufficient concentration and application frequency to maintain a stabilized surface. To the extent practically possible, products shall be selected from lists available from CARB, EPA's Environmental Technology Verification program, or the SCAQMD."

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1 (continued)	C.2.5	C.2-23	Mitigation Measure A-1a	<p>Additionally, as the CARB certification documents indicate, the conditions of use on the CARB-certified products are unreasonably prescriptive and unverifiable (e.g., road should be free of imperfections such as potholes, wash-boarding, aggregate loss, rutting, etc.; "improper" drainage should be corrected, etc.). While complying with the exact verbiage in the certification document would be burdensome, even if perfect compliance were achieved there is no guarantee that the dust control efficiencies measured in the certification tests would be exactly reproduced. This is because there are a large number of site-specific variables that affect final product performance. These variables include meteorological conditions, type of soil, vehicular traffic etc. Measure A-1a as worded seems to be based on the assumption that simply applying the CARB-certified product (even if it were possible to do so in exact compliance with the certification document) would automatically result in an 84% control efficiency. This will not necessarily happen. SCE agrees with the overall point of A-1a, which appears to be that the best possible suppressant products be used to mitigate emissions.</p>	

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2	C.2.5	C.2-24	Mitigation Measure A-1g	<p>On-road vehicle emissions were calculated based on the assumption that on-road vehicles would be compliant with California on-road emission standards. If the contractors can demonstrate that their vehicles are compliant with California on-road emission standards, the requirement for California licensing would be superfluous.</p> <p>SCE wishes to retain the flexibility to use out-of-state contractors who may use vehicles that are not licensed in California. Thus, the requirement in Measure A-1g for California licensing would constrain SCE's choice of contractors. SCE is in agreement with the underlying intent of Measure A-1g, namely, that all on-road vehicles meet relevant California standards. To achieve this end while retaining needed flexibility, SCE will require out-of-state contractors to use vehicles compliant with relevant standards</p>	<p>Revise Mitigation Measure to read ""All on-road construction vehicles shall meet all applicable California on-road emission standards. This does not apply to construction worker personal vehicles".</p>

E.5-2

Response to Comment Set E.5: Applicant – Air Quality

- E.5-1 The intent of SCE’s comment to provide reasonable flexibility regarding soil binders is acceptable providing that assurance of maximum feasible dust control as required under CEQA for the significant unpaved road dust emissions is maintained. In order to maintain maximum feasible dust control the requested change to Mitigation Measure A-1a has been modified as follows:
- CARB certified and ANF approved (on NFS lands) non-toxic soil binders shall be applied per manufacturer recommendations to active unpaved roadways, unpaved staging areas, and unpaved parking area(s) throughout construction (as allowed by responsible agencies such as the Forest Service) to reduce fugitive dust emissions. Other non-toxic soil binder products, selected from lists available from EPA’s Environmental Technology Verification program or the SCAQMD, may be applied per manufacturer recommendations in place of the CARB certified soil binders if such products can be reasonably demonstrated to be as effective as the CARB certified non-toxic soil binders.
- E.5-2 SCE’s suggested revision to mitigation measure A-1g to provide reasonable flexibility for the use of out of state licensed on-road construction vehicles is acceptable as written. However, it should be noted that this revision will increase the documentation requirements of the mitigation monitoring plan.