

APPENDIX F

Responses to Comments on Final Report (Issue 1, Mar 1999)

Appendix F
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Feasibility Study for Providing Noise Mitigation Measures on Existing Flyovers
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<u>Annex A - Comments on Final Report</u>	
<u>General Comments</u>	
1. Prior comments contained in my letter ref. EP 42/T6/1 A1 VII of 18.3.99 are relevant.	Noted.
<u>Specific Comments</u>	
2. S.5.4.6 : Please elaborate the constraints involved with respect to e.g. space requirements, construction traffic impact, etc.	Noted and included.
3. S.5.9.1.4 & S.5.9.2.4 : As advised by HyD, the unit rate for the maintenance cost of noise enclosure is based on the "plan area" but not "plane area". Please check and confirm if the appropriate areas have been adopted for estimating the maintenance costs.	Noted. The area used for estimating the maintenance costs were amended.
4. S.7.7.3 : The meaning of the last sentence is not clear. Clarification and elaboration are required.	Noted. The last two sentences were deleted.
5. S.10.4.4 : To avoid confusion, replace "As commented by FSD in their letter on the Scoping Study" with "As advised by FSD in their letter ref. (13) in FSD/PG4/130/94 III of 19.2.99".	Noted and amended.
6. Appendix E2 : The sample application of the Working Tools shall be amended to suit Comments (1) above. On Tsing Tsuen Bridge - Tsing Yi approach, you should have identified using Charts 4 & 5 that there are space and emergency access constraints for the area to the east of Cheung On Estate.	Noted and amended.
<u>Comments on Air Quality Impact Assessment</u>	
7. You should provide detailed calculations in : i. arriving at emissions at tunnel portals. ii. converting the portal emissions into line source emissions in the Caline4 model.	Please refer to Annex I for the detailed calculations.
8. Further to your responses to our previous comments, you should address the following further comments :	

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<p>i. Item (a) - The effect of cantilevered barriers will shift the traffic emission both horizontal and vertically closer to the receptor HA which is contrary to your assumption. Hence, the concentration level at HA in the mitigated scenario would not be lower than that of the unmitigated scenario.</p>	<p>Please refer to Annex I for our responses.</p>
<p>ii. Item (c) - It is unreasonable to assume the height of the receptor HA to be 16 metres below the emission sources in the mitigated scenario as the receptor HA is physically higher than the road surfaces (which are the sources). Please use a physically realistic simulation or a conservative approach.</p>	<p>Please refer to Annex I for our responses.</p>
<p>iii. Item (i) - It is still not clear from your response whether the pollutants' concentrations were determined at the worst hit levels of the selected ASRs. Please indicate in the report at what level (i.e, ground level, mid level or flag pole level) of the selected ASRs that the pollutants' concentrations were determined. In any case, the pollutants' concentrations at the worst hit levels of the selected ASRs should be determined.</p>	<p>As shown in the previous modelling exercise, the worst-hit level is shown to be the lowest level. Therefore, the pollutant concentrations at the worst-hit levels have been determined as summarized in this study.</p>
<p>iv. Item (k) - We noted that the study is to retroactively implement noise mitigation measures on existing flyovers. However, to determine the air quality impact of the noise mitigation measures, we iterate that the combined effect of traffic volume and emission factors should be considered such that the year selected for assessment represents the worst scenario.</p>	<p>By comparing the emission factors from <i>the Fleet Average Emission Factors – EURO2 Model</i> provided by EPD from the years 1998 to 2011, the trend for the vehicular emission factors gradually decrease with time. Thus, the year 1998 vehicular emission factors selected for assessment represent the worst-case scenario.</p>
<p>v. Item (m) - For clarity, please indicate in the report that background levels were included for the predicted pollutants' concentrations.</p>	<p>Footnotes have been added to indicate that background concentrations are included in the predicted pollutants' concentrations.</p>

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<p><u>Other typos, omissions & errors</u></p> <p>9. The following typos, omissions and/or errors are observed :</p> <p>(a) S.2.1.7.1 & S.2.1.7.2 : While you have noted my earlier comments on the DFR, you however have not placed S.2.1.7.2 before S.2.1.7.1 for a more logical presentation.</p> <p>(b) S.6.4 : My earlier comments on the DFR regarding the elaboration of the constraints associated with the use of external support to strengthen the flyover are not incorporated yet.</p> <p>(c) S.10.3.6 & Table 6 of Appendix A1 : My prior comments on the DFR are noted but however not incorporated into the text yet.</p> <p>(d) Appendix A2, S.4 : "Figure 3" should read Figure 5".</p>	<p>Noted and amended.</p> <p>Noted and included.</p> <p>Noted and amended.</p> <p>Noted and amended.</p>
<p>EPD Letter ref. EP 42/T6/1 A1 VII dated 18.3.99</p> <p>I refer to the captioned report submitted to us for comments. A no. of salient items of the captioned report are observed and are indicated in Appendix A for your necessary reference.</p> <p>Notwithstanding the above and in view of the tight programme, please circulate the report to all concerned parties <u>immediately</u> and request them to return their comments <u>within 2 weeks</u>.</p> <p><u>Annex A - Preliminary Comments on Final Report (Advanced Copy)</u></p> <p>1. S.5.7 : It is agreed that the ACABAS submission on the generic design of the noise mitigation measures would be made separately. To avoid doubt, you are required to indicate in the report that measures to reduce visual/landscape impacts will be developed for the generic design of the noise mitigation measures and for submission to ACABAS for in-principle approval.</p>	<p>Noted. Relevant texts are amended.</p>

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<p>2. S.7.4.1 & Chart 3 : As discussed during the progress meeting held on 27.1.99, you advised that no noise mitigation measures could be erected directly on the identified flyovers due to structural constraints. You further advised that, based on your experience on other flyover projects, it would be in general unlikely practicable to install noise mitigation measures to existing flyovers as additional loading of the measures are usually not allowed during flyover design. Considering the above, you recommended that the approach of using independent support structure shall be adopted in retrofitting existing flyovers. In this regard, you may like to review if Chart 3 is required as part of the Working Tool and amend relevant text including Appendix E2 accordingly. Also, you should clearly spell out the above in the engineering assessment, conclusions and/or recommendations sections.</p>	<p>Noted. Relevant texts are amended and Chart 3 is deleted. Appendix E1 & E2 are amended accordingly.</p>
<p>3. S.8 :</p> <p>(a) Whilst you have evaluated and identified particular ranking systems to prioritise the proposed noise mitigation schemes, the ranking results as well as the recommendation on the specific implementation priority are not clearly stated in the report. Please review and add the above to appropriate section (s).</p> <p>(b) You are required to review the implementation priority of the proposed mitigation schemes taking into account of e.g. % of protection. In this regard, you may like to make reference the CE 8/96 Study.</p>	<p>Noted and included in S.8.4.</p> <p>Noted and included in Table 8-4.</p>

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<p>4. S.9.3.1.3 & Figure 9-1 :</p> <p>(a) According to the typical project programme given in Figure 9-1, the overall time required for implementing the noise mitigation measures including all administrative, design and construction activities is about 4 years. However, it is noted from the outlined implementation programme shown in S.9.3.1.3 that all the identified mitigation measures are to be completed within 3 years (with 1.5 years allowed for each flyover). Apparently there are contradictions among the 2 programmes and clarifications/ amendments are required.</p> <p>(b) On the outlined implementation programme, it is not clear whether you propose to implement the identified noise mitigation measures in a single phase or in 3 separate phases. Clarification is required.</p> <p>(c) On the typical project programme, the programme shall be started on the "zero" date rather than after the 1st quarter.</p> <p>5. S.10 : Whilst you have noted my prior comments on the conclusions and recommendations of the Study, it is however noted that you did not incorporate the necessary amendments into the report :</p> <p>(a) The feasibility/practicability and benefits of the implementation of the proposed noise mitigation measures (i.e. a summary statement of the overall results and your concrete recommendations is required). For instance, it is not clear what is your specific view/recommendation on the retrofitting measures for Tsing Yi approach section of Tsing Tsuen Road (e.g. feasible & practical, feasible but the low % protection does not warrant implementation, not feasible & not practical, etc.</p>	<p>Noted and amended.</p> <p>Noted and amended. The identified noise mitigation measures are proposed to be implemented in 3 separate phases.</p> <p>Noted and Fig. 9-1 is amended.</p> <p>Noted and included in S.10.5.2.</p>

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<p>(b) The implementation strategy and any particulars need to be addressed/ considered (e.g. cost, programme, aesthetical effects, etc.), if the proposed mitigation measures are concluded feasible and practical (i.e. a summary statement of the overall results and your concrete recommendation is required).</p> <p>(c) Criteria for retroactive noise mitigation (i.e. the specific criteria identified in the Study e.g. obstruction to emergency access & fire fighting, road safety, availability of space, etc. shall be clearly indicated in layman terms in the report).</p> <p>(d) The application of the Working Tool (i.e. your recommendation on the use of the Working Tool).</p> <p>In addition to the above, please consider if review of the socio-economic implications due to the proposed mitigation measures should be added to S.10.5.1 as a recommendation for further works. Also please provide a summary statement whether any land resumption is required or not (if yes, where and what the cost and time implications are).</p>	<p>Noted and included in S.10.5.3.</p> <p>Noted and included in S.10.5.4.</p> <p>Noted and included in S.10.5.5.</p> <p>Noted. S.10.5.1 is amended to include the requirement. Land requirement statement is included in S.10.5.3.</p>
<p>(6) D of HyD/Structures Letter ref. () in STR 5/1/23 dated 1.4.99</p> <p>I refer to your letter dated 18 March 1999 and have no comments on the captioned final report.</p>	<p>Noted.</p>
<p>(7) D of TD, PM/NTW Letter ref. (16) in NTW 4/3/89 dated 1.4.99</p> <p>I refer to your letter dated 18/03/99 and have no comments on the Report.</p>	<p>Noted.</p>

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<p>(8) D of HyD/NTW Letter ref. () in HNT/63/56 dated 24.3.99</p> <p>I refer to your above quoted letter of 18 March 1999 enclosing with a copy of the above report.</p> <p>I have no comment on the final report. Please also seek comments from CHE/K, HyD on the assessment for Kwai Chung Road Flyover near Mei Foo Sun Chuen.</p>	<p>Noted. A copy of the final report has been circulated to HyD/K under our letter ref: AC:wnw:93598/01-0108 dated 8.4.99 for comments. Please refer to Item (21).</p>
<p>(9) D of H/CPO Letter ref. HD(P) 1/2/16 dated 29.3.99</p> <p>I refer to your captioned Final Report and the associated Responses to Comments on Draft Final Report (no. 10). Please note that, as a basic principle, every attempt must be made to reduce noise nuisance from the existing flyovers to surrounding residents. As such, please indicate what alternative noise mitigation measures may be available to the residents in Cheung On Estate should independent partial enclosure be found to be ineffective due to the physical constraints. Your response to my previous comments should be amended accordingly.</p>	<p>MCAL Response Letter ref. AC:jcw:93598/01-0107 dated 30.3.99.</p> <p>Thank you for your letter ref: HD (P) 1/2/16 dated 29th March 1999 regarding comments on the "Responses to Comments" Item (10) in Appendix D the above Final Report.</p> <p>Please be advised that the above study is intended to identify any feasible direct technical remedies such as roadside barriers, semi-enclosures and enclosures on existing flyover. Mitigation measures other than the above direct technical remedies would be outside the scope of the above study. We would be glad to refer your comments to EPD/NMPG for their consideration.</p> <p>For your information, EPD is currently implementing a territorised "Quiet Road Surface Programme" to reduce traffic noise by applying Low Noise Road Surface on high speed roads. A copy of the Study Brief Clause 6.1.4. (i)(6) is enclosed herewith for your reference.</p> <p>Should you have any further queries, please feel free to contact us.</p>
<p>(10) D of B/TS Letter ref. (2) in BD(CR) CONS/10 Pt.V dated 25.3.99</p> <p>I have no comment on the Final Report for the captioned study circulated on 18.3.1999.</p>	<p>Noted.</p>

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<p>(11) AC for T, TE(HK) Letter ref. HR 182/193-1B dated 26.3.99</p> <p>I refer to your letter of 18th March 1999 and have no comment on the captioned final report.</p>	Noted.
<p>(12) DEMS Letter ref. (6) in L/M 148-79-98 dated 31.3.99</p> <p>I refer to your letter ref. AC:pct:93598/01-0105 dated 18.3.99.</p> <p>Please be informed that this Department has no further comment to make regarding the captioned report. Should further assistance be required from us, please feel free to contact the undersigned.</p>	Noted.
<p>(13) D of HA Letter ref. HAD/D/16A/46 dated 30.3.99</p> <p>Thank you for your Final Report and please be informed that we have no comment on it.</p>	Noted.
<p>(14) DSD/HK&I Letter ref. (18) in DSD HK 8/CE9597 dated 27.3.99</p> <p>I refer to your letter of 18/3/1999 and have no further comment to the Final Report for the captioned study.</p>	Noted.
<p>(15) CED, GEO/PGCE Letter ref. () in GCFM 5/6/20 - 151 dated 29.3.99</p> <p>I refer to your above referenced letter dated 18.3.99 distributed to this office among others. The Geotechnical Engineering Office has no comments on the captioned final report.</p>	Noted.
<p>(16) D of TD/TS, HQ Letter ref. (24) in TDD 2/1/254 dated 25.3.99</p> <p>I refer to your letter dated 23.3.99 circulating the captioned report and have no comments.</p>	Noted.

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<p>(17) D of TD, PM/HKI&I Letter ref. () in HKIS 4/1/309 dated 24.3.99</p> <p>I refer to your above reference letter of 18.3.99 and have no comments on the captioned Final Report.</p>	Noted.
<p>(18) D of L/Tech Inf Letter ref. (4) in LD 5/5060/94 VII dated 25.3.99</p> <p>I refer to your letter of 18.3.99.</p> <p>I have no further comment on the captioned final report.</p>	Noted.
<p>(19) DUS Letter ref. (14) in USDP 6/402/97 IV dated 25.3.99</p> <p>I refer to your letter dated 18 March 1999 and have no comment on the Final Report.</p>	Noted.
<p>(20) DWS, CE/MSW Letter ref. (5) in WSD/MSW 1744/1076/89 Pt.2 dated 25.3.99</p> <p>I refer to your letter dated 18.3.1999 and have no further comment on the final report.</p>	Noted.
<p>(21) D of Hyd/K Letter ref. KH 8/4/154 (D3) dated 13.4.99</p> <p>I refer to your above-referenced letter dated 8.4.99 to me regarding the captioned subject.</p> <p>Please note that the Kwai Chung Road Flyover near Mei Foo Sun Chuen falls within the boundary of this Region.</p> <p>As far as this Region is concerned, I have no adverse comments on the captioned report.</p>	Noted. Noted.
<p>(22) DSD/MS Letter ref. () in MS 8/CE/95/97 dated 16.4.99</p> <p>I have no comment on this Draft Final Report.</p>	Noted.

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<p>(23) C of P/Traffic Management Bureau Letter ref. (11) in LM/96 in CP/T/TMB 216/61 Pt.3 dated 26.3.99</p> <p>No comments on the Final Report</p>	<p>Noted.</p>
<p>(24) D of FS Letter ref. (16) in FSD/PG 4/130/94 III dated 3.5.99</p> <p>Thank you for your letter of 18.3.99 enclosing the captioned report for my comment.</p> <p>I have no further comments on the captioned report except that the deletion of the criterion on determining the interception of barrier with fire hydrants and valves is not supported. Please reinstate such criterion into Chart 5 of appendix E1 of the report as I have pointed out in my letter of 19.2.99 that it would not be difficult to apply this criterion in the assessment procedure.</p>	<p>Please be advised that the interception of barrier with fire hydrants and valves can be avoided by modifying the layout of barriers locally to suit the fire fighting requirements.</p>
<p>(25) D of H/CCE Letter ref. HD(CE)105/65 dated 3.5.99</p> <p>I have no comment on the technical assessments in the Report.</p> <p>However, I would like to point out that the cost of the mitigation measures should take account of the number of households that can benefit from the improvement scheme. It is therefore advisable to assess the total number of households that can benefit in each scheme in the detailed design stage and work out the cost of mitigation measures per improved household (e.g. with a certain dBA reduced) for deciding on how to implement the scheme.</p>	<p>Noted and included in Table 8-1 and 8-2.</p>
<p>(26) D of HyD/HK Region Letter ref. () in HH 63/50 (DSW) dated 14.5.99</p> <p>I refer to your above letter received earlier.</p> <p>As I confirmed in our subsequent telephone discussion, I have no further comments on the final report.</p>	<p>Noted.</p>

$$\begin{aligned} \therefore \text{Mass of NOx in the first 50m} &= 2/3 * 1/2 * 2299.45 + 884.41 = 1650.89 \text{ gm} \\ \text{Mass of RSP in the first 50m} &= 2/3 * 1/2 * 298.90 + 114.96 = 214.59 \text{ gm} \end{aligned}$$

Similarly,

$$\begin{aligned} \text{Mass of NOx in the second 50m mil} &= 1/3 * 1/2 * 2299.45 + 884.41 = 1267.65 \text{ gm} \\ \text{Mass of RSP in the second 50m mil} &= 1/3 * 1/2 * 298.90 + 114.96 = 164.78 \text{ gm} \end{aligned}$$

$$\begin{aligned} \therefore \text{Emission Factor of NOx in the first 50m} &= \text{actual mass} / \text{traffic flow} / 0.05 \\ &= 1650.89/3313/0.05 \\ &= 9.966 \text{ gm/veh-km} \\ &= 16.04 \text{ gm/veh-mil} \end{aligned}$$

Similarly,

$$\begin{aligned} \text{Emission Factor of RSP in the first 50m mil} &= 214.59/3313/0.05 = 2.08 \text{ gm/veh-mil} \\ \text{Emission Factor of NOx in the second 50m mil} &= 1267.65/3313/0.05 = 12.32 \text{ gm/veh-mil} \\ \text{Emission Factor of RSP in the second 50m mil} &= 164.78/3313/0.05 = 1.60 \text{ gm/veh-mil} \end{aligned}$$

Response to Item 8. i) and ii)

According to the *FHWA User's Guide for CALINE4 – A Dispersion Model for Predicting Air Pollutant Concentrations near Roadways* (Section 9.2), “The model assumes that air flow will adjust to gradual changes in topography. Therefore, receptor and link heights are referenced to the ground level in their immediate vicinity, not to a fixed elevation datum.”

Therefore, in our modeling exercise, although the ASR HA is physically higher than the road surfaces (which are the sources), the modeled height of the ASR HA is still measured from its local ground level.

To further study the effect of the cantilevered barriers, the 1-hour average NO₂ and 24-hour average RSP concentration at ASR HA at various elevations are predicted and listed in the following table:

Height above local ground level (m)	1-hour Average NO ₂ Concentrations (µgm ⁻³)*		24-hour Average RSP Concentrations (µgm ⁻³)*	
	Unmitigated	Mitigated	Unmitigated	Mitigated
2	160	141	133	123
4	141	141	124	122
6	141	141	115	119
8	122	122	106	112
10	103	122	99	104
12	103	103	92	97
14	85	103	87	90
16	85	85	90	90
18	85	85	90	90
20	85	85	88	88
22	85	85	84	84

* Background of NO₂ concentration of 47 µgm⁻³ and RSP concentration of 52 µgm⁻³ are included.

From the above results, the highest 1-hour average NO₂ and 24-hour average RSP are predicted at 2m high. The RSP concentrations at levels 6 metres to 14 metres above local ground in the mitigated scenario are worse than that in the unmitigated scenario. This further demonstrates the lateral dispersion or diffusion of air pollutants arising from the roadside barrier structures.

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(1)	<p>EPD Letter ref. EP 42/T6/1 A1 VII dated 10.8.99</p> <p>I refer our telecom (Alfred Cheng/Edwin Chui) earlier today regarding the captioned.</p> <p>As discussed, I understand that you have duly responded and incorporated all comments from various departments on the Final Report and the Draft Executive Summary. Please incorporate minor comments from our Air Policy Group (see Annex A), and issue the Final Report and Executive Summary to all concerned parties by 16.8.99.</p> <p>Annex A:</p> <p><u>Comments on Responses to Comments & Amended Pages of Final Report (MCA's letter ref. AC:pct:93598/01-0114)</u></p> <p>Responses to Comments</p> <p>a) Item 8i and 8ii, p.F2 to F3 - The proposed L-shaped noise barriers, along the eastbound carriageway of the existing Ap Lei Chau bridge, will limit the lateral dispersion of air pollutants towards the receivers at the back of the noise barriers. However, receiver HA, which is on the opposite side of the flyover facing the front side of the noise barriers, will be subject to more severe pollution impact as the lateral dispersion of pollutants from vehicles is now all forced towards receiver HA (without the noise barriers, the lateral dispersion will be in two directions). Therefore, in calculating the pollutants' concentrations at receiver HA due to the effect of the noise barriers, the source height should not be required to be adjusted but the horizontal distance between the source and receiver HA should be shortened with the length equal to the overhung cantilever. Hence, this will increase the pollutants' concentrations at receiver HA instead of lower it as shown in Table 4-1 of Annex I.</p> <p>Amended Pages of Final Report</p> <p>b) The modelling results for receivers HA shown in</p>	<p>MCA's response letter Ref. 98018a/FWM90813.01</p> <p>Further to your comments dated 10 August 1999 (Ref. EP42/T6/1 A1 VII), we would like to respond as follows:</p> <p>The modelling methodology for ASR HA has been revised in accordance with the suggested methodology.</p> <p>The modelling results for ASR HA has been</p>

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	<p>Table 4-1 are unacceptable with the reasons shown in comments a) above. Please revise the assessment for receiver HA.</p> <p>c) It is noted from the consultants' response that the pollutant concentrations were determined at the worst-hit levels of the selected ASRs. Please also indicate this in the text of the Air Quality Impact Assessment for clarity of the report readers.</p> <p><u>Draft Executive Summary (MCA's letter ref. AC:pct:93598/01-0117)</u></p> <p>a) There are still outstanding comments on the air quality impact assessment . Hence, the air quality impacts indicated in the Executive Summary should be subject to the findings of the air quality impact assessment.</p>	<p>revised in Table 4-1. Please refer to the attached pages.</p> <p>Text has been added in Section 4.</p> <p>Text in p.2 of the Executive Summary is consistent with the updated findings of this study.</p>