



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Mitigated Negative Declaration (MND) for the Idyllwild Wastewater Treatment Plant Improvement Project (Proposed Project) (SCH No. 2024051129)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The Idyllwild Water District (IWD) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments.

### South Coast AQMD Staff's Summary of Project Information in the MND

Based on information provided in the MND, the Proposed Project consists of construction and operation of improvements to the Idyllwild Wastewater Treatment Plant (WWTP) located approximately 255 feet north of the Idyllwild Arts Amphitheater in Idyllwild, CA 92549.<sup>1</sup> The Proposed Project would occur partly within the existing WWTP and on recently acquired land adjacent to the existing WWTP for a total Proposed Project site area of 1.73 acres.<sup>2</sup> The existing WWTP has a treatment capacity of 0.25 million gallons per day (MGD), was constructed in 1966 and became operational in 1971 (making it over 50 years old), and has now exceeded its intended design life.<sup>3,4</sup> The purpose of the Proposed Project improvements would be to: 1) address existing lack of redundancy to provide time for system maintenance; 2) address removal efficiencies for biological oxygen demand (BOD) and total suspended solids (TSS) to avoid permit exceedances; 3) expand equalization capacity to handle high precipitation events; and 4) integrate all facilities under one system and allow modern monitoring and control of the treatment plant. The Proposed Project will not be an expansion of the treatment capacity of the existing WWTP.<sup>5</sup> The Proposed Project's specific workplan consists of the following: 1) improvements to the headworks to include new flume and splitter box; 2) additional equalization for heavy precipitation events/two new secondary treatment bioreactors; 3) new sludge holding tank and new sludge handling system; 4) new supervisory control and data acquisition (SCADA) system to integrate controls for plant; 5) new blowers and associated controls in existing blower room; and 6) new generator and automatic transfer for standby power. Construction of the

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<sup>1</sup> Draft Initial Study/Mitigated Negative Declaration for the Idyllwild Wastewater Treatment Plant Improvement Project (IS/MND). Pages 5 and 6.

<sup>2</sup> *Ibid.* Page 13 and Figure 1-2.

<sup>3</sup> *Ibid.* Page 19.

<sup>4</sup> *Ibid.* Page 5.

<sup>5</sup> *Ibid.* Page 42.

Proposed Project is anticipated to commence in the second quarter of 2025, last 24 months, and be completed by the second quarter of 2027.<sup>6</sup>

### South Coast AQMD Staff's Comments on the MND

#### *Proposed Project May Be Subject to the Following Permitting and Compliance Requirements*

1. During any activities capable of generating fugitive dust (including but not limited to earthmoving activities), actions to prevent, reduce, or mitigate fugitive dust emissions for compliance with South Coast AQMD Rule 403 – Fugitive Dust may be required.
2. Excavation/grading work associated with preparation and/or construction of the Proposed project may be subject to South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil and as such may require a Rule 1166 VOC contaminated soil mitigation plan. In addition, if certain toxic air contaminants are identified in the soil, compliance with South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants may also be required.
3. A Permit to Construct/Operate application will be required for the proposed alterations/modifications to the existing wastewater treatment system.
4. A Permit to Construct/Operate application will be required for any new or modified air pollution control systems associated with the plant improvements.
5. A Permit to Construct/Operate application may be required for prime and/or emergency stationary engines powering pumps, generators, compressors, etc., if the engines are rated above 50 brake horsepower (BHP).
6. A Permit to Construct/Operate application may be required for any sludge holding tanks with safety relief valves that may potentially release air contaminates/odors.
7. Permit to Construct/Operate applications or the use of equipment with appropriate portable equipment permits may be required for equipment used for vegetation/tree removal and associated material handling, such as a chipper, grinder, or screener. Also note that if the chipper, grinder, or screener is powered by an engine, the engine will require a separate permit application consistent with item No. 5 above.

In addition to the aforementioned South Coast AQMD Rules 403, 1166, and 1466, the following South Coast AQMD rules and regulations are the most pertinent to the Proposed Project and include but are not limited to: Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, Rule 401 – Visible Emissions, Rule 402 – Nuisance, Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, Rule 1113 – Architectural Coatings, Regulation XIII – New Source Review, Rule 1401 – New Source Review of Toxic Air Contaminants, and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines.

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<sup>6</sup> *Ibid.* Appendix C: CalEEMod Air Quality/Greenhouse Gas Output, p. 46/60.

*South Coast AQMD Air Permits and Role as a Responsible Agency*

As mentioned earlier in this letter, Staff notes that the Proposed Project will be equipped with a new emergency generator to be housed in a new electrical building and that a fuel tank will also be installed to provide power to the new generator.<sup>7</sup> The Lead Agency states that the new generator will replace the currently operating emergency Onan power generator rated at 125 kilowatts (kW).<sup>8</sup> The Lead Agency also states that South Coast AQMD Permits to Construct and Operate for Public and Private Waste Water Treatment Works may be required.<sup>9</sup> If implementation of the Proposed Project would require the use of new stationary sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. Furthermore, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final MND should include a discussion about any new stationary equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final MND should also include calculations and analyses for construction and operation emissions for any new stationary sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Based on the CalEEMod output files in Appendix C (see Figure 1) and additional technical data files provided to Staff upon request (email communication with Chris Graham, June 11, 2024), it appears that emission calculations and associated analyses for the Proposed Project's new emergency generator were not included in the MND. Please contact South Coast AQMD's Waste Management Engineering and Permitting staff at (909) 396-3627 for questions regarding what types of equipment would require applications for new air permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

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<sup>7</sup> *Ibid.* Page 8.

<sup>8</sup> *Ibid.* Page 8.

<sup>9</sup> *Ibid.* Page 10.

Idyllwild WWTP Replacement Project Detailed Report, 1/26/2024

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

52 / 60

**Figure 1. Screenshot of Appendix C: CalEEMod Air Quality/Greenhouse Gas Output, p. 52/60**

*Additional comments for consideration:*

- In Section 4.1.2, the Proposed Project’s calculated construction regional emissions have been compared to South Coast AQMD’s CEQA regional pollutant emissions significance thresholds for **NO<sub>x</sub>**, **PM<sub>10</sub>**, **PM<sub>2.5</sub>**, and **CO** to determine the Proposed Project’s air quality impacts as shown in Figure 2.<sup>10</sup>

Table 4.1.2-1: Construction Emissions Estimations

CONSTRUCTION YEAR	POLLUTANT (MPOUNDS PER DAY)			
	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO
2025	7.10	0.34	0.32	8.70
2026	6.61	0.31	0.28	8.67
2027	6.26	0.28	0.26	8.68
SCAQMD Significance Thresholds	100	150	55	550
<i>Exceed SCAQMD Thresholds?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: Dewberry, 2024

**Figure 2. Table 4.1.2-1: Construction Emissions Estimations. MND, p. 19-20.**

South Coast AQMD recommends, however, that a Proposed Project’s calculated construction regional emissions also be compared to South Coast AQMD’s CEQA regional pollutant emissions significance thresholds for **SO<sub>x</sub>** and **VOC**.<sup>11</sup> Although the

<sup>10</sup> *Ibid.* Table 4.1.2-1: Construction Emissions Estimations. Pages 19 and 20.

<sup>11</sup> South Coast AQMD’s CEQA regional pollutant emissions significance thresholds can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

**SO<sub>x</sub>** and **VOC** emissions were calculated in CalEEMod for the Proposed Project as can be seen in Appendix C, they were omitted in the Air Quality analysis section of the MND.<sup>12</sup> Staff recommends the Lead Agency include the **SO<sub>x</sub>** and **VOC** emissions analysis and update the Final MND accordingly.

- In Section 4.4.2, the estimated Greenhouse Gas (GHG) emissions calculation of CO<sub>2E</sub>, listed as 159 tons per *day*, does not appear to be consistent with Table 4.4.2-1 which shows an annual CO<sub>2E</sub> estimate of 159 tons per *year*.<sup>13</sup> Staff recommends that the Lead Agency review these calculations and update the Final MND accordingly with the appropriate corrections.

### Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

BR:AS:SW:EA  
RVC240524-03  
Control Number

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<sup>12</sup> IS/MND. Pages 18 through 26.

<sup>13</sup> *Ibid.* Pages 38 and 39.