



South Coast Air Quality Management District

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SENT VIA E-MAIL:
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**Initial Study/Mitigated Negative Declaration (IS/MND) for the Proposed
Joaquin Ranch Pump Station Disinfection System Improvements [Project No. D2199]
(Proposed Project)
(SCH No: 2024110094)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The Rancho California Water District is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, which are organized by topic of concern.

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

Based on the information provided in the IS/MND, the Proposed Project consists of the construction and operation of the chloramination disinfection facilities at the existing Joaquin Ranch Pump Station.¹ The Proposed Project is located at 42581 Vineyard Parkway.² The Proposed Project's construction includes demolishing the existing chlorine injection facilities, constructing a masonry equipment building, a split air conditioning system, installing a chemical fume odor scrubber, chemical dosing controls and equipment, and chemical injection equipment.³ The Proposed Project's operation includes one monthly tanker truck delivery of 12.5% bulk sodium hydrogen solution and one monthly tanker truck delivery of 40% liquid ammonium sulfate.⁴ Based on the aerial photograph review, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residence) is approximately 50 feet northeast of the Proposed Project site.

South Coast AQMD Staff's Comments on the IS/MND

South Coast AQMD Air Permits and Role as a Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, scrubbers, 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 Sections 15086, the

¹ IS/MND, Page 1.

² *Ibid.* Page 3.

³ *Ibid.* Page 2.

⁴ *Ibid.*

Lead Agency is required to consult with South Coast AQMD. In addition, 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 and portable 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 the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <http://www.aqmd.gov/home/permits>.

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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:DN

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