



South Coast Air Quality Management District

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January 14, 2016

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Draft Mitigated Negative Declaration (DMND) for the Proposed Central Energy Plant Expansion

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document both as a commenting agency and a responsible agency. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration (Final MND).

Project Description

In the project description, the Lead Agency proposes demolition of an approximately 6,000 square foot structure and construction of four components to increase the chiller capacity at the University of California, Irvine Medical Center. An approximately 8,800 gross square foot (GSF), 4,000 ton chiller plant will be installed (west of the existing Building 31) along with an approximately 6,500 GSF power generator yard that will include a 2,000-kilowatt (kW) generator and an associated belly fuel tank. Additional generators are planned in this power generator yard to meet future needs. In addition to this chiller plant and generator yard, an existing chiller plant (Building 57) will be expanded to feed chilled water and normal and emergency electrical power to Buildings 1A and 3. The expansion will also include a 1,000-ton chiller with plans to add another chiller in the future. Besides these added chillers, an additional 1,500 kW generator will be installed to serve the existing Buildings 1A, 3 and 31 as well as for future needs. The proposed construction is expected to last for 120 days beginning in June 2016.

Permit Requirements/Health Risk Assessment

In the Final MND, the Lead Agency should include the SCAQMD as a responsible agency whose approval is required for permit purposes. In the air quality analysis, the Lead Agency estimated construction and operational air quality emissions for regional and localized impacts. For operations, emissions were also estimated for activities including the proposed emergency generators and cooling towers. In addition to estimating operational emissions for CEQA purposes, permits may be required for certain basic and/or control equipment by the SCAQMD. Whether a permit is required is based upon in part, on the energy rating of a chiller, a boiler, a heater, a generator, etc. For example, if any of the proposed generators are diesel-fueled and are

rated greater than 50 brake horsepower (bhp), a permit would be required in accordance with SCAQMD rules including Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Initial Engines and Rule 1110.2 – Emissions From Gaseous and Liquid-Fueled Engines. Other SCAQMD rules and/or regulations would apply to other permitted equipment.

In addition, a health risk assessment may also be required based on certain criteria. Based on the project description, the proposed chiller units may require a health risk assessment to estimate the potential risk to sensitive receptors and workers from the particulate emissions emanating from the groundwater. If required, the Final MND should include the estimated risk from the proposed chiller units. Should the Lead Agency have permit questions concerning the generators, chillers (including questions about health risk assessment requirements), or whether any other ancillary equipment needs a permit, these questions can be directed to Engineering and Compliance Staff at (909) 396-2208.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. If you have any questions concerning this letter, please contact Gordon Mize, Air Quality Specialist, at (909) 396-3302.

Sincerely,

Jillian Wong

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ORC151229-08
Control Number