



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Mitigated Negative Declaration (MND) for the Proposed Rehabilitation and Expansion of Lenain Water Treatment Plant**

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

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to make a number of improvements to the Lenain Water Treatment Plant (Plant) to increase the safety and security of the Plant, maintain regulatory compliance, improve reservoir water quality, and increase water capability, provide flexibility for future plan expansion, and improve Plant reliability (Proposed Project). According to the MND, “[t]he area is surrounded by residential development to the north, northwest, and east, and a golf course is located west of the Plant<sup>1</sup>.” Construction is expected to begin in August 2018 through December 2019 with most improvements completed during a scheduled Plant shutdown around November 2018 through May 2019 months<sup>2</sup>.

### SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and found that the Proposed Project's air quality impacts from construction and operation activities would be less than significant. The Lead Agency is committed to implementing three mitigation measures (MM-AQ-1 through MM-AQ-3)<sup>3</sup> to ensure greater reductions to air quality.

SCAQMD staff reviewed and has comments on the Air Quality Analysis. Please see the attachment for more information. The attachment also includes SCAQMD staff's comments on mitigation measures and provides information on SCAQMD rules and permits.

### Closing

Pursuant to 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. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

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<sup>1</sup> MND. Page 3.

<sup>2</sup> MND. Page 7.

<sup>3</sup> MND. Page 26-27.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS

ORC180320-04

Control Number

## ATTACHMENT

### Localized Air Quality Analysis during Construction

1. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips).

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. They include schools, parks and playgrounds, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. Based on a review of aerial photographs and a description of sensitive receptors in the MND<sup>4</sup>, SCAQMD staff found that the Proposed Project is surrounded by residential uses to the north, northwest, and east. However, the Lead Agency did not quantify the Proposed Project's localized construction emissions in the MND. Therefore, SCAQMD staff recommends that the Lead Agency quantify the Proposed Project's localized construction emissions and disclose the localized air quality impacts in the Final MND to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis is available on SCAQMD website<sup>5</sup>.

### Recommended Changes to Existing Mitigation Measure (MM-AQ-2)

2. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. SCAQMD staff recommends incorporating the following changes to MM-AQ-2 in the Final MND to further reduce construction emissions from NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.

MM-AQ-2 Contractors shall use Tier ~~3~~ 4 engines ~~or greater~~ for off-road equipment rated at ~~75~~ 50 HP or greater throughout construction activities. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provisions of written documents by contractors to prove and ensure compliance.

### Additional Recommended Air Quality Mitigation Measure

3. To further reduce VOC emissions from architectural coatings, SCAQMD staff recommends that the Lead Agency incorporate the following recommended mitigation measure in the Final MND.

MM-AQ-4 Require the use of architectural coatings (no more than 50 grams/liter of VOC) that are beyond limits in SCAQMD Rule 1113 – Architectural Coatings.

### SCAQMD Rules and Permit

4. The Final MND should discuss how the Lead Agency will comply with applicable SCAQMD rules and regulations, including, but are not limited to, the following:

- a. SCAQMD Rule 1113 – Architectural Coatings<sup>6</sup>.

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<sup>4</sup> MND. Page 3.

<sup>5</sup> South Coast Air Quality Management District. *Localized Significance Thresholds*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

<sup>6</sup> South Coast Air Quality Management District Rule 1113. Last amended February 5, 2016. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

- b. The Proposed Project will involve installation of an emergency backup generator. If an emergency generator rated greater than 50 brake horsepower (bhp) is necessary, a permit from the SCAQMD would be required and the SCAQMD should be identified as a CEQA Responsible Agency for this Project. Assumptions used in the CEQA document will be the basis for permit conditions and limits<sup>7</sup>. The Final MND should also demonstrate compliance with SCAQMD Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion Engines, and Rule 1110.2 – Emissions From Gaseous- and Liquid-Fueled Engines. If there are permit questions concerning the generator, they can be directed to Engineering and Compliance Staff at (909) 396-2315.

#### Other Comment

5. In Table 4 of the MND, the Lead Agency compared the estimated construction maximum daily emissions from criteria pollutants in tons/year to SCAQMD daily thresholds. Since SCAQMD daily air quality CEQA thresholds of significance for construction and operation are in pounds per day (lbs/day), it is recommended that the Lead Agency revise Table 4 in the Final MND. Alternative, since Table 3 already shows the estimated construction maximum daily emissions in lbs/day, the Lead Agency should revise Table 3 to include SCAQMD daily air quality CEQA thresholds of significance for construction in lbs/day for comparison.

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<sup>7</sup> MND, Page 25. Accessed at: <http://www.anaheim.net/DocumentCenter/View/19823>. Table 5, *Project Operational Emissions (lbs/day)*, in the MND, showed that the Proposed Project's operational emissions from emergency stationary generator would generate zero emissions in lbs/day for ROG, NOx, CO, SOx, PM10, and PM2.5.