



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Whittier Narrows Operable Unit Treatment (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Department of Toxic Substances Control (DTSC) is the CEQA Lead Agency for the Proposed Project. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposed to construct 7,285 linear feet of groundwater pipelines 30 inches in diameter, a water storage tank, and a water pump station on 2.5 acres. The Proposed Project is located in the Whittier Narrows Recreational Area that is located at 331 North Durfee Avenue near the northeast corner of Rosemead Boulevard and Durfee Avenue in the City of South El Monte. Construction of the Proposed Project is expected to take 12 months¹. Once operational, a new backup generator would be required (160 horsepower) to serve as emergency power for the electric booster pumps².

South Coast AQMD Staff's Comments

South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities³

In the MND, the Lead Agency included a discussion of South Coast AQMD Rule 1403 requirements⁴. Rule 1403 and U.S. Code of Federal Regulations (CFR) Title 40, Part 61, Subpart M National Emission Standard for Asbestos⁵ apply to any underground asbestos-containing pipelines and any tie-in to the existing underground water supply pipelines, if asbestos greater than one percent is found. The Lead Agency should include a discussion in the Final MND on how the Proposed Project will maintain compliance with asbestos rules if any previously unknown asbestos containing pipelines are disturbed during grading or excavation. South Coast AQMD staff recommends that the Lead Agency detail the requirements that include a comprehensive asbestos survey by a Certified Asbestos Consultant, notification requirements for demolitions, and how any verified asbestos-containing materials will be abated prior to renovation or demolition in the Final MND. The Lead Agency will also need to identify where the asbestos-containing waste materials will be disposed. When asbestos-containing waste materials are disposed, it has the potential to result in emissions from the transportation and generate solid waste that the Lead Agency should evaluate in the Final MND.

¹ MND. Page 28.

² *Ibid.*

³ South Coast AQMD. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

⁴ MND. Page 25.

⁵ U.S. CFR Title 40, Part 61, Subpart M. Accessed at: https://www.govregs.com/regulations/title40_chapterI_part61_subpartM.

Responsible Agency

In the MND, the Lead Agency states that the back-up generator that would be required for the new booster pumps would be permitted under South Coast AQMD rules and regulations⁶, the Lead Agency should identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND. The assumptions in the air quality analysis in the Final MND will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Conclusion

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 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, responses 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, informative, or useful to decision makers and the public who are interested in the Proposed Project.

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. If you have any questions or wish to discuss the comments, please feel free to contact me at lsun@aqmd.gov or Mr. John Anderson, Air Quality Analysis and Compliance Supervisor, at janderson@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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⁶ MND. Page 28.