



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

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CEQA@ocsd.com

Kevin Hadden, Principal Staff Analyst
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

Recirculated Draft Environmental Impact Report (Draft EIR) for the Proposed Bay Bridge Pump Station and Force Mains Replacement Project (SCH No.: 2016111031)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments include recommended air quality mitigation measures that the Lead Agency should include in the Final EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency is proposing to demolish an existing 4,800-square-foot pump station facility and construct a new 14,500-square-foot pump station facility with an adjacent 1,300-square-foot odor control facility and a 760-square-foot backup generator facility (Proposed Project). The Proposed Project also includes installing force main and gravity sewer improvements. The Proposed Project is located northwest corner of North Bayside Drive and East Coast Highway at 300 East Coast Highway within the City of Newport Beach. Construction of the Proposed Project is anticipated to occur over a 36-month period, from 2023 through 2026¹. Once operational, the Proposed Project will include operations of an odor control scrubber system and emergency backup generator². Upon review of Table 5.2-2: *Sensitive Receptors* in the Recirculated Draft EIR, South Coast AQMD staff found that the closest residential sensitive receptors are located 25 feet south of the Proposed Project³.

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section of the Recirculated Draft EIR, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized construction air quality impacts would be less than significant⁴. The Lead Agency also found that the Proposed Project would not result in net new mobile or stationary source emissions during operation and that operational air quality impacts would be less than significant⁵. No mitigation measures for construction or operation of the Proposed Project were included⁶. In the

¹ Draft EIR. Section 5.2 Air Quality. Page 17; Appendix 11.2 Air Quality/Greenhouse Gas Emissions/Energy Data.

² Draft EIR. Chapter 3 Project Description. Pages 8 to 12.

³ Draft EIR. Section 5.2 Air Quality. Page 6.

⁴ *Ibid.* Pages 13 to 17, 19 to 21.

⁵ *Ibid.* Page 18.

⁶ *Ibid.* Pages 13 to 25.

Recirculated Draft EIR, the Lead Agency discussed applicable South Coast AQMD Rules⁷ 402 – Nuisance⁸, 403 – Fugitive Dust⁹, and 1403- Asbestos Emissions from Demolition/Renovation Activities¹⁰.

South Coast AQMD Rules and Permits

In addition to South Coast AQMD Rules 402, 403, and 1403, the Proposed Project may be subject to the requirements of the following South Coast AQMD rules and regulations, which should be discussed in the Final EIR to demonstrate that the Proposed Project will comply with them. Information on each of the rule and/or regulation is available on South Coast AQMD's website at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book>.

- Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil
- Regulation 13 – New Source Review
- Rule 1401 – New Source Review of Toxic Air Contaminants

In the Recirculated Draft EIR, the Lead Agency identified South Coast AQMD as a Responsible Agency for the Proposed Project since implementation will require permits from South Coast AQMD¹¹. It is important to note that the assumptions in the air quality analysis in the Final EIR will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. Question on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. Since the Proposed Project will include the operation of an odor control scrubber system and a backup generator, the Proposed Project will be required to submit complete and timely permit applications to South Coast AQMD for the following equipment:

- Applications for Permit to Construct and Permit to Operate will be required for the proposed odor control scrubber system.
- Applications for Permit to Construct and Permit to Operate will be required for any chemical storage tanks not exempted by Rule 219.
- Applications for Permit to Construct and Permit to Operate will be required for engines powering the pumps at the pump station, if the engines are rated above 50 brake horsepower (BHP).
- Applications for Permit to Construct and Permit to Operate will be required for engines powering the back-up electrical generator at the pump station, if the engine is rated above 50 BHP.

⁷ Draft EIR. Section 5.2 Air Quality. Pages 15, 17.

⁸ South Coast AQMD Rule 402 – Nuisance. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

⁹ South Coast AQMD Rule 403 – Fugitive Dust. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>

¹⁰ South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>

¹¹ Draft EIR. Chapter 2 Introduction and Purpose. Pages 6 to 7.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to 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. Please contact Alina Mullins, Air Quality Specialist, at amullins@aqmd.gov if you have questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM/AS
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