



# 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 City of Chino State Street Water Treatment Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Chino is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revision to information about South Coast AQMD rules and permits, and the identification of South Coast AQMD as a Responsible Agency that the Lead Agency should incorporate in the Final MND.

### **South Coast AQMD Staff's Summary of Project Information in the MND**

Based on the MND, the Lead Agency proposes developing a new centralized State Street Water Treatment Facility (State Street WTF) that will treat water from Wells 12 and 14 for nitrate, perchlorate, and 1,2,3-TCP<sup>1</sup>. The Proposed Project also includes the installation of off-site water transmission and brine pipelines, improvements of existing wells, and site improvements<sup>2</sup>. Treatment is anticipated to include pretreatment through sand separators followed by cartridge filters (solids removal), 1,2,3-TCP Removal through Granular Activated Carbon (GAC), perchlorate and nitrate removal through a proprietary ion exchange (IX) treatment system, then disinfection and storage in Reservoir 5 before distribution<sup>3</sup>. The water treatment facility will have a capacity to treat up to 4,000 gallons per minute (GPM), and the anticipated extraction rate from each well is 2,000 GPM<sup>4</sup>. The Project site is approximately 5 acres in San Bernardino County's Valley Region<sup>5</sup>. The Project is located at 10762 Benson on the southwest corner of the intersection of West State Street and South Benson Avenue<sup>6</sup>. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residence - mobile home park) is within 100 feet southwest of the Proposed Project. Construction of the Proposed Project is anticipated to begin in mid-2022. Operation is expected to start in 2023.

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

<sup>2</sup> Ibid. Project Description. Page 3.

<sup>3</sup> Ibid. Project Description. Page 3.

<sup>4</sup> Ibid. Project Description. Page 3.

<sup>5</sup> Ibid. Existing Settings. Page 3.

<sup>6</sup> Ibid. Introduction. Page 1.

South Coast AQMD Staff's Comments*Responsible Agency and South Coast AQMD Permits*

In the event that the Proposed Project or implementation of the Proposed Project requires the use of stationary equipment, permits from South Coast AQMD are required unless a written permit is not required<sup>7</sup>. The Lead Agency should use good faith effort to include a discussion of equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND.

In addition to South Coast AQMD Rules 402 and 403 that were discussed in the MND, the Proposed Project will be subject to additional permitting requirements that should be discussed in the Final MND. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 or visit South Coast AQMD's web page for more general information on permits: <http://www.aqmd.gov/home/permits>.

Conclusion

According 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 the Lead Agency's position is at variance with recommendations raised in the comments, the 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 and 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. Please contact Dung Nguyen, Air Quality Specialist, at [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov) should you have any questions.

Sincerely,

*Michael Morris*

Mike Morris

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MM:DN

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<sup>7</sup> South Coast AQMD. Rule 219. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf>.