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Sent: Friday, February 11, 2022 4:35 PM
To: Eugene Kang; Henry Pourzand
Cc: Kaufman,Carol Y; Lego,Emerson F
Subject: MWD Response to Discussion on SCAQMD PR 403.2
Attachments: Attachment 1--MWD Maintenance & Repair Activities.docx

Good Afternoon Eugene & Henry,

We appreciated the informative discussion on Proposed Rule (PR) 403.2—Fugitive dust from Large Roadway Projects last week. As part of our conveyance and distribution system, the Metropolitan Water District of Southern California (Metropolitan) owns and operates an extensive network of pipelines throughout South Coast AQMD’s jurisdiction. As we explained, Metropolitan does not perform large public roadway infrastructure construction projects, however, some of our projects may be associated with large public roadways. Projects may involve wet saw-cutting of the roadway surface, excavation to the depth of the pipeline/vault, installation/maintenance/repair to the pipeline, backfilling and restoration of the roadway. Associated roadway projects predominantly do not entail daily active operations on the roadway, such as crushing, screening, grinding or grading that are common in roadway infrastructure projects. Additionally, Metropolitan’s maintenance & repair projects are often completed within a very short duration to minimize impacts to water deliveries. Photos of associated roadway projects for maintenance and repair activities to Metropolitan’s pipelines have been included in Attachment 1.

Our projects go through a rigorous California Environmental Quality Act (CEQA) review process by our Environmental Planning section to determine if mitigation measures are required for emissions including dust and particulate matter, in addition to permitting with the local agency that has oversight of the roadway. As South Coast AQMD identified in the October 22, 2021 Working Group Meeting presentation, local agencies oftentimes already require notice to sensitive receptors and prohibition of certain activities depending on distance to residential receptors. Providers of essential public services strive to maintain excellent relationships with the communities within which we are operating to ensure impacts are minimized to the greatest extent feasible. Maintaining compliance with the combined local agency/city requirements and existing SCAQMD Rule 403 fugitive dust requirements should largely address fugitive dust control from these types of water conveyance projects that may occur on or adjacent to a large roadway.

However, for such projects located near receptors, it may be beneficial to build upon the Rule 403 language for Large Operations to further minimize fugitive dust the suggested control measures in PR403.2

As such, we would like to offer the following suggestions:

Applicability:

- (b) The provisions of this Rule shall apply to large roadway projects and associated large roadway projects with the potential of generating fugitive dust impact, located within 500 feet of areas of public exposure or 1,000 feet of sensitive receptors on near road communities, as defined in this Rule. The requirements of this Rule do not replace or supersede the requirements of any other applicable Rule.

Definitions:

- (3) ASSOCIATED LARGE ROADWAY PROJECT means a project located on or adjacent to a large roadway conducted by a provider of an essential public service related to the installation, maintenance and/or repair of infrastructure not directly associated with the roadway.

- (13) LARGE ROADWAY means any roadway, with an annual daily average number of vehicle trips in excess of 100,000, as listed in [insert reference].

Control Measures:

Material Piles—Apply dust suppressant as necessary, ~~but no less than twice per hour~~ to maintain a stabilized surface and prevent visible emissions; Install coverings; and Install an enclosure with a minimum of three sides (the open side of which will face farthest from potentially impacted areas) and walls with a maximum porosity of 50 percent and a minimum height equal to the highest point of the material pile. ~~Adjacent material piles within 25 feet of each other as measured from the closest edge of each pile shall be considered to be a single pile.~~

Exemptions:

- (f)(2) The provisions of sections (d)(1), (d)(2), (d)(3)(A), (d)(3)(C), and (d)(3)(D) shall not apply to any associated large roadway projects.

While we do not anticipate that many of our projects will occur on large public roadways, we felt it was important to convey the very different type of work that is performed for installation, maintenance and repair activities conducted by essential public services compared to roadway infrastructure projects.

We appreciate the ongoing dialogue and SCAQMD’s willingness to consider the practical implications for associated roadway construction projects. Please let us know if you have any follow-up questions.

Thank you,

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THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

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Attachment 1

Metropolitan Water District of Southern California

Photos of Maintenance & Repair Activities

1. Crane lowering a new valve into a trenched section of roadway



2. Inside view of the trench and vault (regular access would be via manhole)



3. Example of Prestressed Concrete Cylinder Pipe Project—This is not in a roadway, but the process would be very similar. Excavation would be to the depth of the pipe, the walls would be shored up for safety (this photo allows for more sloping of the walls than what would be done on a roadway), the top half of the pipe is saw cut and new pipe can be inserted.

