



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: MARCH 11, 2005

March 11, 2005

Ms. Angie Anderson
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

Draft Environmental Impact Report (Draft EIR) for the Proposed Replacement of Ellis Avenue Pump Station Replacement Project

The South Coast Air Quality Management District (SCAQMD) 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 Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Subsequent Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

ORC050125-02
Control Number

Draft Environmental Impact Report (Draft EIR) for the Proposed Replacement of Ellis Avenue Pump Station Replacement Project

1. The SCAQMD recommends modifying the listed mitigation measures as follows:

Recommended Changes:

M-7.5-1a - Dust Control

- Apply water as necessary, or apply non-toxic soil stabilizers according to manufacturers specifications on all unpaved access roads, parking areas and staging areas at construction sites.
- Sweep daily (~~with water sweepers~~ using SCAQMD Rule 1186 certified water sweepers and recommend water sweepers using reclaimed water) all paved access roads, parking areas and staging areas at construction sites.
- Sweep daily (~~with water sweepers~~ using SCAQMD Rule 1186 certified water sweepers and recommend water sweepers using reclaimed water) if visible soil material is carried onto adjacent streets. Water twice daily or apply non-toxic soil binders according to manufacturers specifications to exposed soil stockpiles.
- Limit traffic speeds on unpaved roads to 15 mph or less.

M-7.5-1c – Truck Emissions Reductions

- During construction, trucks and vehicles in loading or unloading queues shall be kept with their engines off, when not in use, to reduce vehicle emissions. Otherwise, restrict vehicle idling to five minutes or less. Construction activities shall be discontinued during second-stage smog alerts.

Additional recommended mitigation measures include the following:

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Replace ground cover in disturbed areas as quickly as possible;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.

**Draft Environmental Impact Report (Draft EIR) for the Proposed Replacement of
Ellis Avenue Pump Station Replacement Project**

2. Since short-term project impacts were estimated to be significant for oxides of nitrogen (NO_x), the lead agency should consider modifying mitigation measure M-7.5-1b on page 3.2-11 and adding the following mitigation measures to further reduce NO_x impacts from constriction activities, if applicable and feasible:

- Contractors shall maintain all on- and off-road equipment engines in proper working order according to manufacturers specification and operate construction equipment so as to minimize exhaust emissions. Such equipment shall not be operated during first or second stage smog alerts.

Additional recommended mitigation measures include the following:

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
 - Reroute construction trucks away from congested streets, residential areas or schools.
 - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
 - Restrict idling emissions by using auxiliary power units and electrification.
 - Give preferential consideration to contractors who use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses low sulfur diesel and is equipped with oxidation catalysts, particulate traps, or other retrofit technologies, etc.
3. The lead agency discusses applicable regulations starting on page 3.2-2 in the Draft EIR. The lead agency should also include discussion concerning the influence of complying with SCAQMD Rule 402 – Nuisance in the Final EIR.
4. Review of the construction emission spreadsheets in Appendix C indicates the following apparent discrepancy. The first spread sheet for each site entitled “Estimated Emissions From...” shows in part the number of each type of construction equipment used for that site. The spreadsheet table that follows on the next page entitled “Construction Equipment Emissions” shows emissions for all listed equipment even though the spreadsheet table on the preceding page shows that some types of equipment are not present at the site. It appears that the lead agency has either underestimated the number of equipment at each site or construction equipment emissions are overestimated. This same discrepancy occurs for each construction site. Please explain or correct this apparent discrepancy.