



# South Coast Air Quality Management District

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**FAXED: FEBRUARY 17, 2006**

February 17, 2006

Ms. Deirdre West  
Metropolitan Water District of Southern California  
P. O. Box 54153  
Los Angeles, CA 90054-0153

Dear Ms. West:

**Draft Subsequent Environmental Impact Report (DSEIR) for the  
Robert B. Diemer Treatment Plant Improvements: January, 2006**

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 in the Final Subsequent 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 certification of the Final Subsequent Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

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

Attachment

SS: CB  
ORC060110-01  
Control Number

**Draft Subsequent Environmental Impact Report (DSEIR)  
Robert B. Diemer Treatment Plant Improvements**

1. **Mitigating Project Construction Emissions:** Although Tables 3.2-4, 3.2-5, 3.2-7, 3.2-8 and 3.2-12 in Volume I of the DSEIR show construction NO<sub>x</sub> emissions exceeding the SCAQMD significance thresholds, the lead agency has not proposed any measures to reduce the NO<sub>x</sub> emissions.

SCAQMD staff therefore recommends the following mitigation measures for consideration by the lead agency for implementation where feasible:

- For all construction equipment, the lead agency should require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, the lead agency should require the use of oxidation catalysts and low-sulfur diesel as defined in SCAQMD Rule 431.2, i.e., diesel with sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NO<sub>x</sub> emissions by 50 percent.
- Require the use of aqueous or emulsified diesel fuel for all equipment. Aqueous diesel formulations have received interim verification by the California Air Resources Board and show a reduction of 16% in NO<sub>x</sub> and 60% in PM10 from diesel exhaust. Information on commercial availability of these products can be obtained at the following websites:  
[www.arb.ca.gov/fuels/ddiesel/altdiesel/altdiesel.html](http://www.arb.ca.gov/fuels/ddiesel/altdiesel/altdiesel.html),  
[www.lubrizol.co/PuriNox/markets\\_distributors.asp](http://www.lubrizol.co/PuriNox/markets_distributors.asp),  
[www.cleanfuelstech.com/Customers/Customers.htm](http://www.cleanfuelstech.com/Customers/Customers.htm).
- Use electricity from power poles instead of temporary diesel- or gasoline-powered generators.
- Prohibit construction heavy-duty vehicles from idling in excess of five minutes to be consistent with state law.
- Keep construction equipment properly tuned up.

SCAQMD staff also recommends the following mitigation measures for the temporary concrete batch plant that will be located at the site during construction:

- Perform periodic street sweeping with SCAQMD Rule 1186-compliant street sweepers if visible accumulations of mud or concrete occurs on the nearby streets.

- Maintain sand storage piles sufficiently damp to prevent the formation of a visible dust cloud when material is removed from storage to charge the hoppers.
- Water frequently the in-plant truck travel route to limit dust emissions from the equipment moving on in-plant surfaces.

2. **Operational Emissions:** Referencing the FEIR for the Robert B. Diemer Water Filtration Plant Improvements Project (MWD 2000) and the Supplemental EIR (MWD 2002), the lead agency concludes on pages 3.2-21 and 3.2-23 that operational emissions from the proposed project are less than significant. Although CEQA allows a lead agency to tier off or incorporate by reference analysis from a previous environmental impact report, it would be helpful if the lead agency would summarize the analysis, or present a table in the report, showing the project's operational emissions. This will demonstrate that the operational impacts from the proposed project are within the scope of the analysis in the referenced environmental impact report. SCAQMD staff requests that this information be presented in the final SEIR.