



South Coast  
Air Quality Management District

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

**FAXED: DECEMBER 14, 2007**

December 14, 2007

Mr. Donn Montag  
City of Rialto  
Development Services Department  
150 South Palm Avenue  
Rialto, CA 92376

Dear Mr. Montag:

**Draft Environmental Impact Report (DEIR) for the  
Rialto Wastewater Treatment Plant Master Plan Expansion**

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 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 Environmental Impact Report. The SCAQMD would be available 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  
Planning, Rule Development & Area Sources

Attachment

SS: CB

SBCO71031-02  
Control Number

**Draft Environmental Impact Report (DEIR) for the  
Rialto Wastewater Treatment Plant Master Plan Expansion**

**1. Project Operational Air Quality Impacts:**

The lead agency has not calculated the proposed project's operational air quality impacts. On page 15 of the DEIR, the lead agency states "Because the facility will be more efficient, it was assumed that no additional workers would be required and that delivery of water treatment chemicals would not increase. Criteria pollutant emissions from project operations would therefore be insignificant."

The lead agency has not provided any information on the number of vehicles currently servicing the facility, the emissions from these vehicles, emissions from the treatment plant facilities, emission factors and any changes in emissions as a result of the expansion of the plant from approximately 12 million gallons per day to 16 million gallons per day. The lead agency has not provided any information that would substantiate the lead agency's assertion that there will be no increase in operational emissions. Please provide information on criteria pollutant emissions as well as VOC emissions, hydrogen sulfide and ammonia emissions from any combustion equipment and treatment processes as applicable. Please describe the measures that would be implemented to control emissions as well as odors.

The proposed project appears to be located in an industrial area and surrounded by industrial facilities. However, it is not clear from the DEIR whether there are any residences or sensitive receptors in the vicinity of the project. The DEIR states on page 3.2-7 that there are no known sensitive receptors within one mile of the project site. The next statement, "The closest residences to the project site are approximately 0.5 mile to the west." Residences are also considered to be sensitive receptors. Based on the proximity of the residences, the SCAQMD requests that the lead agency identify control measures to reduce emissions and odors that would adversely affect these residents.

**2. SCAQMD Applicable Rules and Permits:**

Depending on the type of equipment that will be installed as part of the expansion project, permits from the SCAQMD may be required, which means that the SCAQMD is potentially a responsible agency. As a result, by not identifying the equipment that will be included as part of the expansion project and not quantifying potential operational air quality impacts, if the SCAQMD is a responsible agency the Draft EIR prepared by the lead agency is not adequate for SCAQMD permitting purposes. Therefore, the SCAQMD requests that operational air quality impacts be quantified and recirculated pursuant to CEQA Guidelines Section 15088.5.