South Coast
Air Quality Management District
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**FAXED: DECEMBER 14, 2007**

December 14, 2007

Mr. George Thacker
City of Banning
Water/Wastewater Utilities Department
176 East Lincoln Street
Banning, CA 92220

Dear Mr. Thacker:

**Initial Study/Mitigated Negative Declaration (MND) for Wasterwater Treatment Plant Expansion and Phase I Recycled Water System**

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 Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. 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

RVCOO71116-04
Control Number

**Initial Study/Mitigated Negative Declaration (IS/MND) for the Wastewater Treatment Plant Expansion**

**1. Construction Emissions:**

There are a number of problems with the construction analysis. First, the lead agency provides only the results of the analysis. Calculation methodologies, including equations, and assumptions used in the analysis are not provided. Further, on page 4-2 of the General Conformity analysis, the lead agency states that USEPA emissions factors were used to calculate onsite construction equipment and workers' travel. The lead agency should be aware the U.S.EPA emission factors are not appropriate for use in California because California fleets are subject to different requirements than fleets used to derive the U.S. EPA factors. For offroad mobile sources (construction equipment) the California Air Resources Board (CARB) OFFROAD model emission factors should be used. For on-road mobile sources, CARB's EMFAC 2007 emission factors should be used.

The daily construction emissions on page 17 are based on the annual emission results computed in the General Conformity document and converted into pounds per day by dividing the annual emissions by 230 days per year. The SCAQMD recommends against this type of approach because the results represent average emissions. For the purposes of CEQA, the SCAQMD requests that the lead agency calculate and report peak daily construction emissions. Finally, the emissions reported are suspect because for some construction activities, e.g., installation of pipeline from well R1, zero emissions are shown for some pollutants (CO and ROG, for example). This activity would require construction equipment and CO and ROG are components of exhaust.

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

The lead agency has not calculated the proposed project's operational air quality impacts. The only general information on potential operational emissions is provided on page 17 of the IS/MND, where the lead agency states that there would be no net change in operational vehicles that would travel within the service area, and that the impacts to air quality from exhaust emissions from these vehicles would be considered less than significant. The lead agency has not provided any information on emission calculation methodologies, emissions from the treatment plant facilities, emission factors and any changes in emissions from the treatment facilities and equipment used as a result of the proposed expansion of the plant from 3.6 million gallons per day to 5.1 million gallons per day. Please provide information on criteria pollutant emissions as well as VOC emissions, hydrogen sulfide, ammonia, and 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 from the plant facilities. According to Table 1 on page 10 of the IS/MND, over 9,000 residential units in new communities are planned to be located in the vicinity of the proposed project expansion. To avoid future odor complaints and

potential exposures to emissions by future residents in the new communities, aggressive odor and emission controls should be implemented.

**3. SCAQMD 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 IS/MND prepared by the lead agency is not adequate for SCAQMD permitting purposes. Therefore, the SCAQMD requests that the construction analysis be revised according to comment # 1, that operational air quality impacts be quantified and the IS/MND be recirculated pursuant to CEQA Guidelines Section 15073.5

**4. Localized Significance Thresholds:**

Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the health of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html. Note that localized impacts analysis should be done for both construction and operation and there are two corresponding look-up tables for that as well.