



South Coast  
Air Quality Management District

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**FAXED: NOVEMBER 30, 2007**

November 30, 2007

Mr. Don Johnson  
County of Orange  
Resources and Development Management Department  
300 North Flower Street  
P. O. Box 4048  
Santa Ana, CA 92702-4048

Dear Mr. Johnson:

**Negative Declaration (ND) for Collins Maintenance Facility 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 in the final Negative Declaration.

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

ORC071114-05  
Control Number

## **Negative Declaration (ND) for Collins Maintenance Facility Project**

### **1. Quantification of Project Emissions:**

According to the lead agency, page 4-28 of the MND, the construction of the proposed project would generate pollutant emissions from the following activities: demolition operations, construction worker travel to the site, delivery and hauling of construction materials and supplies to and from the project site, fuel combustion by on-site construction equipment, the application of architectural coatings and asphalt that release reactive organic gases, and dust generation from construction vehicles travel. The lead agency does not quantify emissions from construction or operation. Instead, the lead agency dismisses construction emissions by stating that the emissions from these activities would be short-term. Please note that designations of nonattainment are based on daily exceedances of an ambient air quality standard. Consequently, whether or not emissions are temporary is irrelevant to determining air quality significance. In addition, although the site is an existing facility, the SCAQMD requests that the lead agency quantify change in emissions from current operations to future operations.

In general, the SCAQMD recommends that project emissions for all proposed projects be calculated. To calculate potential adverse air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use either the emission calculation methodologies from the 1993 SCAQMD CEQA Air Quality Handbook or use the URBEMIS 2007 model, which is available at the following web site: [www.urbemis.com](http://www.urbemis.com). If the lead agency uses the URBEMIS model to calculate project emissions, SCAQMD staff recommends that the model output printout be included in the ND appendix to facilitate review.

### **2. Applicable SCAQMD Rules:**

On page 1-3 of the ND the lead agency lists SCAQMD Rule 402 – Nuisance, and Rule 403 – Fugitive Dust as the SCAQMD Rules that would apply to the proposed project. Since the proposed project involves demolition of structures, the proposed project may also be subject to SCAQMD Rule 1403 – Asbestos from Demolition/Renovation Activities, should the demolished structures contain asbestos.

Please note that although in general, SCAQMD Rule 219(d)(7) – Equipment Not Requiring A Written Permit Pursuant to Regulation II, exempts natural gas compressors from permit applications, any internal combustion engines that are used to drive the compressors would be subject to SCAQMD Regulation XIII – New Source Review, and, therefore, would also need permits.