



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Temescal Valley Water Reclamation Facility Expansion Project

South Coast Air Quality Management District (SCAQMD) staff 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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct three sedimentation tanks, three sequencing batch reactors, two odor filters, and two aerobic digesters, and replace an existing 487-horsepower (hp) diesel-fueled engine with a 1,073-hp diesel-fueled engine on 0.85 acres (Proposed Project). The Proposed Project is located on the southeast corner of Temescal Canyon Road and Pulsar Court in the community of Temescal Valley within Riverside County. Construction of the Proposed Project is expected to last 18 months starting in early 2019 and will involve demolition of existing piping¹.

Permits and Compliance with SCAQMD Rules

Since the Proposed Project includes construction and operation of new wastewater treatment equipment, permits from SCAQMD will be required, and SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. The Lead Agency shall submit three applications for Permit to Construct and Permit to Operate for the Proposed Project, which will include modification to an existing sewage treatment plant, an addition of a new odor control system, and an addition of an emergency diesel-fueled generator². The Lead Agency shall also notify SCAQMD's Permit Services as to whether the change from Lee Lake Water District is a change of ownership or a change of name. It is important to note that permits granted by SCAQMD are nontransferable. A change of operator or an addition of an operator(s) under the same conditions of a Permit to Operate shall be subject to permit processing fee(s)³.

The Final MND should include a discussion of compliance with applicable SCAQMD Rules, including, but not limited to, Rule 201 – Permit to Construct⁴, Rule 203 – Permit to Operate⁵, Rule 301 – Permitting

¹ MND, Section 2.3.1, Page 5.

² A permit for Facility ID #187470 for an emergency diesel-fueled generator greater than 500 hp was applied for and issued in 2018. If the equipment discussed in the MND is different from the permit for Facility ID #187470, the Lead Agency will need to obtain a permit for a new emergency diesel-fueled generator greater than 500 hp. South Coast Air Quality Management District, Facility Information Detail (FIND). Facility ID #187470. Accessed at: http://www3.aqmd.gov/webappl/fim/prog/facility_details.aspx?fac_id=187470.

³ South Coast Air Quality Management District, Rule 209 – Transfer and Voiding of Permits. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-209.pdf>.

⁴ South Coast Air Quality Management District, Rule 201 – Permit to Construct. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

⁵ South Coast Air Quality Management District, Rule 203 – Permit to Operate. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

and Associated Fees⁶. Additionally, if the proposed demolition of existing piping has the potential to result in airborne asbestos, a discussion of compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities⁷ should be included in the Air Quality Section of the Final MND. Any assumptions used in the Air Quality Analysis in the Final MND will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact the SCAQMD’s Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit SCAQMD’s webpage at: <http://www.aqmd.gov/home/permits>.

Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project’s construction and operational emissions and compared those emissions to SCAQMD’s recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project’s construction and operational air quality impacts would be less than significant⁸. However, it did not appear that the Air Quality Analysis included an analysis of the increased operational Volatile Organic Compounds (VOCs) that are expected to result from the Proposed Project’s increased wastewater throughput of 1.575 million gallons a day (mgd) to 2.25 mgd⁹. This may have likely led to an under-estimation of the Proposed Project’s operational emissions. Therefore, to ensure technical completeness and a good-faith effort at full disclosure of the potential air quality impacts from all operational aspects of the Proposed Project, it is recommended that the Lead Agency quantify and disclose the Proposed Project’s operational emissions from the increased throughput of wastewater treatment and include these emissions in Table 3 *Estimated Maximum Daily Operational Emissions*¹⁰ in the Final MND to determine the level of significance.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM/CT
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Control Number

⁶ South Coast Air Quality Management District. Rule 301 – Permitting and Associated Fees. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-iii/rule-301.pdf>

⁷ South Coast Air Quality Management District. Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>

⁸ MND. Section 3.3. Pages 22-29.

⁹ MND. Section 1.2. Page 1.

¹⁰ MND. Section 3.3. Page 24.