



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 Talbert Extraction Well Decommissioning Project

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes phased demolition and decommissioning of seven existing extraction wells and associated infrastructure, and construction of a new monitoring well on 2.75 acres (Proposed Project)¹. Phase One includes demolition of the seven existing extraction wells². Phase Two includes demolition and removal of the below-ground concrete vaults associated with the existing extraction wells³. Phase Three includes the abandonment of the water supply pipelines for the existing extraction wells⁴. Phase Four includes construction of the new monitoring well and associated infrastructure⁵. The existing extraction wells to be demolished as part of the Proposed Project are located in various locations along Adams Avenue and Indianapolis Avenue near Magnolia Street within the City of Huntington Beach. The monitoring well to be constructed as part of the Proposed Project would be located near the intersection of Dana Drive and Galbar Circle within the City of Huntington Beach. Construction of the Proposed Project, including demolition, is expected to be completed in 74 days⁶.

Responsible Agency and South Coast AQMD Permits

It is important to note that generally, operation of portable engines and portable equipment units of 50 horsepower or greater that emit particulate matter require a permit from South Coast AQMD or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)⁷. The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if there is any diesel-powered equipment during implementation that will require a South Coast AQMD permit or if the equipment will need to be registered under the PERP through CARB. If a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in 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 South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit

¹ MND, Appendix A, *Air Quality, Energy, And Greenhouse Gas Emissions Impact Analysis*. CalEEMod Summer Run. PDF Page 77.

² MND, Page 2-5.

³ *Ibid.*

⁴ *Ibid.*, Page 2-6.

⁵ *Ibid.*

⁶ *Ibid.*, Page 2-7

⁷South Coast AQMD. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

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 South Coast AQMD 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.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:RD

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