



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

July 24, 2019

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Mitigated Negative Declaration (MND) for the Proposed Plant 30 Wellhead Treatment 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 the demolition of approximately 100 cubic yards (cy) of existing on-site improvements, the construction of a wellhead treatment system, and installation of 8,100 linear feet of pipeline ranging in diameter from four inches to 20 inches on 0.6 acres (Proposed Project)¹. The wellhead treatment system portion of the Proposed Project is located on the southwest corner of San Bernardino Street and North Benson Avenue and the pipeline portion of the Proposed Project is located along North Benson Avenue between Palo Verde Street and Orchard Street in the City of Montclair. Construction of the Proposed Project, including demolition and pipeline installation, is expected to be completed in 10 months². Operation of the wellhead treatment system would have a throughput of 6,000 gallons per minute (GPM)³.

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction air quality impacts would be less than significant, after the implementation of air quality Mitigation Measures (MMs) AIR 1 and 2⁴, which require dust control measures, a preference for Tier 3 off-road construction equipment, and a restriction of idling to five minutes⁵.

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)⁶. The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if there is any diesel-powered equipment during project implementation that will require a South Coast AQMD permit or if any 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

¹ MND. Page 2.

² *Ibid.* Page 17.

³ *Ibid.* Page 2.

⁴ *Ibid.* Page 37.

⁵ *Ibid.*

⁶South Coast AQMD. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

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 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>.

Demonstration of Compliance with South Coast AQMD Rule 1403

Since the Proposed Project would include demolition, and in the event asbestos is encountered during demolition, South Coast AQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities⁷ in the Final MND.

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.

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Planning, Rule Development & Area Sources

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SBC190703-04
Control Number

⁷ South Coast AQMD. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.