



# South Coast Air Quality Management District

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**Mitigated Negative Declaration (MND) for the Proposed  
Ion Exchange Treatment Plant 7991 Replacement Project (Proposed Project)  
(SCH No.: 2021080361)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Coachella Valley Water District is the California Environmental Quality Act Lead Agency for the Proposed Project. The following comments include information on South Coast AQMD's rules and permits that the Lead Agency should include in the Final MND.

**South Coast AQMD Staff's Summary of Project Descriptions in the MND**

In the MND, the Lead Agency is proposing to demolish and replace the existing ion exchange treatment plan (IXTP) by demolition of the existing plant and replacing it with a new treatment system, sulfuric acid and caustic soda systems, and associated backwash pumps, pre-filters, backwash tanks, new well pump, and associated piping, which will be housed within new buildings on site and has a higher treatment capacity for removal of groundwater arsenic. The proposed IXTP will subsequently be reconnected to the existing asbestos cement pipe water main for distribution of treated water to the existing Reservoir 7990. Additionally, a new 300-kilowatt (kw) emergency diesel generator is proposed to supply backup power to the proposed IXTP and will be housed in the chemical systems building. Construction may involve excavation as deep as 15 feet below ground surface. The Proposed Project is located at 67050 Hammond Road near the northwest corner of Hammond Road and Johnson Street in the community of Mecca within Riverside County. The Proposed Project is also located within the designated AB 617 Eastern Coachella Valley community. The Lead Agency identified that permit to construct and permit to operate (for diesel backup generator) and a fugitive dust control plan from the South Coast AQMD may be required for the Proposed Project<sup>1</sup>.

**South Coast AQMD Staff's Comments**

*Responsible Agency*

Since implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. The assumptions in the air quality analysis in the Final MND will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

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<sup>1</sup> MND. Page 2-17.

*South Coast AQMD Rules and Regulations*

The following South Coast AQMD's rules and regulations are most pertinent to the Proposed Project and should be discussed in the Final MND. South Coast AQMD's rules and regulations are available on the South Coast AQMD's website<sup>2</sup>.

- Rule 201 – Permit to Construct
- Rule 203 -Permit to Operate
- Rule 401 – Visible Emissions
- Rule 402 – Nuisance
- Rule 403 – Fugitive Dust
- Rule 403.1 – Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources
- Rule 431.2 – Sulfur Content of Fuels
- Rule 1110.2 – Emissions from Gaseous- and Liquid-fueled Engines
- Rule 1113 – Architectural Coatings
- Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil
- Regulation XIII – New Source Review
- Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- Rule 1470 – Requirements for Stationary Diesel-fueled Internal Combustion and Other Compression Ignition Engines

Since the Proposed Project may include a replacement engine (driving an electrical generator), the Proposed Project may be required to submit complete and timely a permit application to South Coast AQMD for the following equipment:

- Applications for Permit to Construct and Permit to Operate will be required for engines rated above 50 brake horsepower (BHP). In the MND, the Proposed Project includes the replacement of the existing backup generator with a new 300-kW generator. Based on information presented in Appendix B, it is unclear whether the proposed generator will have a rating of 300 kW or 300 BHP.

*Other Comments for the Lead Agency's Consideration*

- Based on the provided address, the subject facility would identified as ID 86156, which presently has one actively permitted equipment: the backup diesel generator.
- While no emission factors were provided for the proposed emergency diesel engine outside of the rated power generator output to cross check estimated emissions, the CalEEMod output files in Appendix B of the MND indicates a rating range between 300-600 BHP with a horsepower rating of 300 BHP as an input value and provides the estimated operational emissions summary<sup>3</sup>. The MND assumes an operational schedule 24 hours a day for the diesel backup generator. It is important to note that a 300-BHP engine is expected to be under-representative of a 300-kW generator, although the total emissions assessment may not be under-representative, since a 24/365 operation was assumed, which is unlikely for diesel backup generator.

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<sup>2</sup> South Coast AQMD Rule Book. Accessed at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/>.

<sup>3</sup> MND. Appendix B. Section 2.2. PDF pages 243 and 266.

- South Coast AQMD staff will re-evaluate emissions on criteria pollutants and GHGs upon submittal of a complete and timely permit application prior to permit approval and subsequent construction and operation. Below is an example calculation using the estimated NO<sub>x</sub> & ROG pounds per day (lbs/day) values from the MND to compare to the current applicable BACT emission limit units (g/bhp-hr). Note that the BACT requirement for NO<sub>x</sub>+NMHC emissions from stationary emergency compression ignition engines 300 ≤ HP < 750 BHP is compliance with Tier 3 Emission Standards (3.0 g/bhp-hr).

$$\left( 33.02 \frac{\text{lb NO}_x}{\text{day}} + 11.81 \frac{\text{lb ROG}}{\text{day}} \right) \times \frac{1 \text{ day}}{24 \text{ hr}} \times \frac{1}{300 \text{ bhp}} \times \frac{453.59 \text{ g}}{1 \text{ lb}} \approx 2.8 \frac{\text{g (NO}_x + \text{ROG)}}{\text{bhp} \cdot \text{hr}}$$

### 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, responses 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 me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun  
Program Supervisor, CEQA IGR  
Planning, Rule Development & Area Sources

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