



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed OU2 Groundwater Containment Facility Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Santa Fe Springs is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revision to information about South Coast AQMD rules and permits, and the identification of South Coast AQMD as a Responsible Agency that the Lead Agency should incorporate in the Final MND.

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

Based on the MND, the Lead Agency proposes the construction of a groundwater treatment project located at 10051 Santa Fe Springs Road, Santa Fe Springs¹. The project site is a 3.23-acre (140,791 square feet) site that was previously part of a larger 27-acre property that was utilized as an oil extraction operation². The proposed project is a response action to address the contaminated groundwater at the Omega Chemical Superfund Site³. The proposed site has land use and zoning designation of M-2 Manufacturing⁴ and is surrounded by industrial development on all sites of the property. The groundwater treatment project is to include the construction and operation of up to seven groundwater extraction wells at four well sites, a greensand filtration system, an advanced oxidation process (AOP), liquid phased granular activated carbon adsorption system, a reverse osmosis treatment system, and backwash and permeate storage tank, all within a 48,649 square feet treatment system building⁵. The treatment system is to be fully enclosed within a new concrete building that will be constructed within the project site⁶. The normal operation of the system is to be automated with computer-aided instrumentation, and the system is anticipated to be operated 24 hours per day and between 328 and 365 days per year⁷. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residence) is approximately 1,200 feet south of the Proposed Project. The Proposed Project will take approximately fourteen to eighteen months to complete⁸.

¹ MND. Section 1. Page 7.

² Ibid. Section 2. Page 11.

³ Ibid. Page 3.

⁴ Ibid. Section 2. Page 11

⁵ Ibid. Section 2. Page 11

⁶ Ibid. Section 2. Page 7.

⁷ Ibid. Section 2. Page 7.

⁸ Ibid. Section 2.4.2. Page 18

South Coast AQMD Staff's Comments*Responsible Agency and South Coast AQMD Permits*

In the event that the Proposed Project or implementation of the Proposed Project require the use of stationary equipment, permits from South Coast AQMD are required unless a written permit is not required⁹. The Lead Agency should use good faith effort to include a discussion of equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND.

In addition to South Coast AQMD Rules 402 and 403 that were discussed in the Draft MND, the Proposed Project will be subject to additional permitting requirements that should be discussed in the Final MND. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 or visit South Coast AQMD's web page for more general information on permits: <http://www.aqmd.gov/home/permits>.

Conclusion

According 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 the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and 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 Dung Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

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MM:DN

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⁹ South Coast AQMD. Rule 219. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf>.