South Coast
Air Quality Management District
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FAXED: OCTOBER 2, 2007

October 2, 2007

Ms. Peggy Reyes
Desert Sands Unified School District
Facilities Services
47-950 Dune Palms Road
La Quinta, CA 92253

Dear Ms. Reyes:

Mitigated Negative Declaration for Palm Desert High School Reconstruction Project
(August 2007)

The South Coast Air Quality Management District (SCAQMD) 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 in the final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.,
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS: CB

RVC070904-10
Control Number

Mitigated Negative Declaration (MND) for Palm Desert High School Reconstruction Project

Fugitive Dust Control Plan:

At the top of page 56 under "Mitigation Measure" the lead agency states that the construction contractor will submit a fugitive dust control plan that prohibits earthmoving activities when wind conditions exceed 25 miles per hour, require soil stabilizers, etc. The fugitive dust control plan should, at a minimum, also include the mitigation measures and details of the measures identified in the URBEMIS 2007 model output sheets in Appendix B that were used to reduce particulate emissions to less than significant, e.g., replacing ground cover, reduce speeds on unpaved roads to less than 15 miles per hour, etc.

Accidental Release Analysis

On page 69 of the MND, the lead agency states that the presence of a regulated substance in excess of a defined threshold quantity that may present an acute hazard from process upset and/or accidental release was not found. However, page 8 (D-10 of Appendix D) of the HRA states that the Coachella Valley Water District's Water Reclamation Plant 10 stores 32,000 pounds of chlorine in one-ton cylinders. The HRA states that the worst-case off-site consequence analysis (OCA) scenario in the Risk Management Plan (RMP) presents a 3.0 ppm concentration endpoint of 1.3 miles from the storage building, which would encompass the school site. According to the discussion on page 17, the school is one-tenth of a mile away from the Reclamation Plant. A chlorine concentration of 3.0 ppm is equal to the Emergency Response Planning Guideline level 2 concentration, which is often used as a significance threshold for accidental releases. The HRA states that the worst-case scenario is conservative and that the alternative release scenario is more realistic, therefore there would be no acute health impacts on the school site.

SCAQMD staff disagrees with this assessment. If the OCA for the RMP states that the worst-case scenario would result in a toxic endpoint that would encompass the school, then the acute adverse impacts from the Coachella Valley Water District's Water Reclamation Plant 10 would appear to be significant. Based on this analysis SCAQMD staff believes an EIR should be prepared for the proposed project, unless this impact can be mitigated to less than significant.

Health Risk Assessment

Electronic data on the HRA were not provided to SCAQMD staff. SCAQMD staff contacted the lead agency by telephone, but did not receive a response to the messages left. Lead agency staff should have provided SCAQMD staff electronic copies of all air dispersion input, output and calculations for the currently proposed project and requests that these materials be provided with the CEQA documents for all future documents submitted to the SCAQMD for review.

No reference is provided for the emission calculations provided for the Coachella Valley Water District's Water Reclamation Plant 10. Approximately 1.4 pounds per year of formaldehyde emissions presented in the HRA. The SCAQMD FIND database (http://www.aqmd.gov/webappl/fim/default.htm) presents 13.9 pounds of formaldehyde annually for the Coachella Valley Water District's Water Reclamation Plant 10 in 2001. In addition, the HRA only examined four TACs (chloroform, formaldehyde, toluene, and xylene). The FIND database lists 22 TACs for the Coachella Valley Water District's Water Reclamation Plant 10 in 2001. The lead agency should consult with the SCAQMD about establishing an agreed upon set of emissions from the Coachella Valley Water District's Water Reclamation Plant 10 for the final CEQA document.

Palm Springs meteorological data were used. No discussion was provided on the choice of the Palm Springs meteorological data set over the Indio meteorological data set, especially given the fact that the lead agency states on page 48 that the Indio monitoring station is the closest station to the proposed project. SCAQMD staff suggests that the lead agency consult SCAQMD staff on the appropriate choice of meteorological data. The final CEQA document should include a discussion on choice of the meteorological data set.