



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: November 30, 2012
jburror@ocsd.com

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Mr. Jim Burror
Orange County Sanitation District
Engineering Planning
10844 Ellis Avenue
Fountain Valley, CA 92708

Review of the Draft Subsequent Environmental Impact Report (Draft SEIR) for the P2-92 Sludge Dewatering and Odor Control Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft Supplemental Environmental Impact Report (Draft SEIR) the lead agency has not fully disclosed the project's operational emissions thereby lacking sufficient information to substantiate the Draft SEIR's significance determination. Therefore, the AQMD staff recommends that the lead agency provide additional air quality data in the Final EIR including equipment specifications, studies, references and any other information necessary to demonstrate the project's operational air quality impacts. Further, the AQMD staff is concerned about the significant cumulative air quality impacts identified in the Draft SEIR that are primarily a result of diesel truck haul trips associated with the project's operations. Therefore, the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines Section 15126.4. Further, the AQMD staff requests that the lead agency comply with all AQMD permitting and notification requirements. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other

questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

ORC121019-01
Control Number

1. Operational Emissions (Stationary Sources), BACT, Title V

The lead agency does not identify the project's peak daily operational emissions (i.e., stationary source emissions) for the proposed project including the dewatering centrifuges, odor control system and utility support equipment. Further, the lead agency does not provide any supporting data or reference material to demonstrate that the emissions from the proposed project are below or consistent with current operational emissions levels at the project site. As a result, it does not appear that the lead agency has substantiated the project's significance determination; therefore, AQMD staff recommends that the lead agency provide sufficient air quality data in the Final EIR including equipment specifications, studies, references, data and any other information necessary to demonstrate the project's impacts. As a responsible agency, if AQMD is to rely on the EIR prepared for this project, there must be sufficient detail for our agency to conclude that air quality impacts are adequately evaluated and disclosed. Also, to demonstrate compliance with AQMD permitting requirements the lead agency should provide an analysis of alternative technologies applicable to the proposed project and present the project's peak daily emissions using these technologies. In the event that the proposed control strategies do not meet permitting requirements the lead agency may default to the alternative emissions analysis.

Operational Emissions (Mobile Sources)

2. The lead agency determined that the daily operational NOX emissions generated from delivery truck trips to the project site result in significant cumulative air quality impacts, therefore, the AQMD staff recommends that the lead agency consider requiring the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and biosolids haul trucks). Further, if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency should require trucks that meet EPA 2007 model year NOx and PM emissions requirements.

AQMD Permitting and Notification Requirements

3. The new sludge dewatering and biosolids storage and handling facility will generate emissions, including volatile organic compounds, reduced sulfur compounds, and ammonia. These emissions will be required to meet applicable requirements including Regulation XIII, Best Available Control technology (which includes BACT) and Rule 1401, New Source Review for Air Toxics. Also, the lead agency should follow AQMD notification requirements regarding demolition projects. Further, the lead agency should submit to AQMD completed applications for permit to construct and operate for the modification to the sewage treatment plant and for the construction of two new air pollution control systems at least six months prior to the estimated start of construction.