



South Coast  
Air Quality Management District

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Mr. Daniel R. Feron, Chief Engineer  
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P.O. Box 7005  
Mission Viejo, CA 92690

**Draft Environmental Impact Report for the Proposed Upper Chiquita Emergency  
Storage Project**

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 into the Final Environmental Impact Report.

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 Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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

Attachment

SS:GM

ORC080213-04  
Control Number

### **Accidental Releases**

1. The Public Health and Safety discussion in Section 3.7 of the Draft EIR states that the facility would need to prepare a Risk Management Plan/California Accidental Release Plan (RMP/CalARP) for the storage and use of aqueous ammonia which would provide information on the potential impact zone of a worst-case release; require plans and programs designed to minimize the probability of a release, and mitigate potential impacts. The discussion concludes that since the project includes on-site storage of more than 55 gallons of a hazardous material (in this case, aqueous ammonia), the release or threatened release of hazardous materials would represent a significant impact to public health and safety.

Without an estimate of the potential off-site consequences, it is difficult for the public to evaluate the potential adverse impacts from the proposed project. While the preparation of a complete RMP/CalARP plan may not be possible at this point, because not all of the information is available, the lead agency should prepare an estimate of the potential off-site consequences in the Final EIR. Based on the assumption that 10,708 pounds of ammonia at 20 percent concentration will be used, EPA's "RMPcomp" program estimates a 0.6 mile toxic endpoint. The nearest sensitive receptors (a baseball field to the west and a high school to the south) from the proposed pump station, which includes a 7,000 gallon storage tank, are at approximately 2,200 feet. The occupants of any vehicles traveling along Oso Parkway and Route 241 are closer to the proposed pump station than the baseball field and high school.

In addition, alternatives should be added that evaluate the placement of the pump station/ammonia storage tank.

### **Health Risk Assessment**

2. In compliance with SCAQMD Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines, the lead agency should include in the Final EIR an estimate of the cancer risk for the standby diesel generator as described on page 2-7 of the Draft EIR. In addition, the lead agency should also include in the Final EIR the engine specifications, i.e., the model number, size, horse-power, estimated frequency of operation, etc. Because the specifications for the diesel generator were not included in the Draft EIR, SCAQMD staff was not able to calculate the risk associated with burning diesel fuel. In addition, SCAQMD Rule 1470 requires the installation of exhaust controls and limits the frequency of operation.
3. The lead agency should also include in the Final EIR an estimate of the health risk for the aqueous ammonia storage tank as described on page 2-7 of the Draft EIR to demonstrate compliance with SCAQMD Rule 1401 – New Source Review for Toxic Air Contaminants.

### **SCAQMD Permits/Public Notice**

4. The lead agency should cite compliance with SCAQMD Rule 212 - Standards for Approving Permits and Issuing Public Notice in the Final EIR for the proposed standby diesel generator, the proposed 7,000 gallon aqueous ammonia tank, and the 25,000 gallon total capacity of the sodium hypochlorite solution tanks. Questions concerning permitting and compliance for those pieces of equipment can be directed to SCAQMD staff at (909) 396-2591.

### **Construction Mitigation Measures**

5. Because the quantity of NOx emissions from construction activities were concluded to be significant and due to the length of the proposed project construction schedule of 26 months, the lead agency should consider adding the following mitigation measures to Mitigation Measures A-1 and A-2 in order to further reduce NOx and other impacts including fugitive dust (PM10) from the proposed project, if applicable and feasible:

Recommended Changes (as indicated in the underlined text):

- Halt all grading and excavation operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.
- Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and/or washed at the end of each workday. Recommend the use of SCAQMD Rule 1186 and Rule 1186.1 certified street sweepers or roadway washing trucks using reclaimed water.

Recommended Additions:

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Install wheel washers where vehicles enter and exit the construction site onto paved roads, or wash off trucks and any equipment leaving the site each trip;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent possible;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;

- Require construction equipment that meet or exceed Tier 2 standards and equip construction equipment with oxidation catalysts, particulate traps, or other verified/certified technologies, etc.;
- Configure construction parking to minimize traffic interference; and
- Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.