



South Coast  
Air Quality Management District

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**Review of the Draft Environmental Impact Report (Draft EIR)  
for the Proposed Western Riverside Wastewater Treatment  
Plant Enhancement and Expansion 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 either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

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 "Susan Nakamura".

Susan Nakamura  
Planning and Rules Manager  
Planning, Rule Development & Area Sources

Attachment

EE:DG

RVC091201-04  
Control Number

**Air Quality Analysis and Mitigation Measures:**

1. Given that the lead agency's regional construction air quality analysis demonstrates that the criteria pollutant emissions exceed the SCAQMD's daily significance thresholds for NO<sub>x</sub>, the SCAQMD staff recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

NO<sub>x</sub>

## Recommended Additions:

- Alternative fueled off-road equipment;
- All streets shall be swept at least once a day using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water);
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Configure construction parking to minimize traffic interference;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas; and
- Improve traffic flow by signal synchronization.

In addition to the above NO<sub>x</sub> mitigation measures, SCAQMD staff recommends modifying the required mitigation measures on page 5-23 of the Draft EIR as follows:

- Maintain construction equipment engines by keeping them properly tuned and maintained according to manufacturers' specifications;
- Do not idle trucks onsite for more than 10 minutes at a time Prohibit all diesel trucks from idling in excess of five minutes, both on-site and off-site; and
- Provide particulate traps and oxidation catalysts on construction equipment Require construction equipment that meet or exceed Tier 3 emission standards and equip construction equipment with CARB verified oxidation catalysts and particulate traps.