



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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Draft Program Environmental Impact Report (Draft PEIR) for the Proposed Biosolids Master Plan (Project No. PS15-01)

The South Coast Air Quality Management District (SCAQMD) staff 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 PEIR.

SCAQMD Staff's Summary of Project Description and Air Quality Analysis

The Lead Agency proposes to implement nine projects, including upgrades to and construction of new biosolid handling facilities and relocation of a collection yard between Orange County Sanitation District (OCSD)'s two wastewater treatment plants (Fountain Valley Plant No. 1 -Facility I.D. 17301 and Huntington Beach Plant No. 2- Facility I.D. 29110) over a 20-year period with a buildout year in 2040 (Proposed Project). Specifically, the Proposed Project includes the following elements:

- Extension and improvement of the perimeter screening at Plant No. 2 to provide a visual buffer for all proposed facilities and associated construction activities;
- Construction of an interim food waste facility (250 wet ton per day capacity);
- Demolition of warehouse and reconstruction of warehouse at a new location at Plant No. 2;
- Relocation of the collections yard from Plant No. 2 to Plant No. 1;
- Construction of six 40' H. x 110' Dia. digesters, six 400,000 gallon above ground batch tanks with ancillary equipment, and a new Digester Feed Facility (DFF) which includes sludge thickening tanks and ancillary equipment;
- Relocation and modification to the existing ferric facility, demolition of Power Building C, and the demolition and reconstruction of four digesters;
- Construction of a larger capacity food waste receiving station to replace interim food waste facility;
- Demolition of seven digesters, relocation of three mesophilic digesters, and the construction of an equipment room with ancillary equipment at Plant No. 2, and
- Demolition of the six remaining digesters at Plant No. 2. A majority of the Proposed Project would be implemented at Plant No. 2.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that construction and operational emissions are less than significant after incorporating Mitigation Measures AQ-1 and AQ-2¹. SCAQMD staff has comments on

¹ Draft PEIR. Table ES-2. Page ES-10.

the air quality analysis methodology in the Draft PEIR. Please see the attachment for more information. The attachment also includes information of SCAQMD permits, rules, and regulations.

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final PEIR. In addition, 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, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS/CT
ORC180227-03
Control Number

ATTACHMENT

Air Quality Analysis – Overlapping Construction and Operational Activities

1. When specific development is reasonably foreseeable as a result of the goals, policies, and elements of the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in a CEQA document. As stated above, the Proposed Project includes nine projects that will be implemented over a 20-year period. Based on a review of Table 2-4 in the Draft PEIR, SCAQMD staff found that there is a reasonable possibility that the construction activities of new biosolid handling facilities may overlap with operation of the newly updated and constructed biosolid handling facilities as part of the Proposed Project. In the event an overlapping construction and operation scenario is reasonably foreseeable, the Lead Agency should analyze a scenario where construction activities overlap with operational activities, unless the Lead Agency expressly prohibits overlapping construction and operational activities.

To analyze worst-case impact that may be foreseeable at the time the Draft PEIR is prepared, SCAQMD staff recommends that the Lead Agency identify the overlapping years among the nine projects, combine construction emissions with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA operational thresholds of significance to determine the level of significance in the Final FEIR. In the event that the Lead Agency, after revising the Air Quality analysis, finds that the Proposed Project's air quality impacts would be significant, mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4.

Permits and Compliance Requirements

2. Since permits from SCAQMD will be required for the Proposed Project, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final PEIR. The Proposed Project is subject to the following SCAQMD permitting and compliance requirements.
 - a) The proposed excavations for the at Plant No. 1 and No. 2 will require a SCAQMD Rule 1166 – VOC Contaminated Soil Excavation Plan, if VOC contaminated soil is expected to be encountered during the excavation activities, and/or may be subject to SCAQMD Rule 1466 if the soil contains other toxics.
 - b) The proposed demolition of structures will be subject to SCAMQD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities.
 - c) The proposed construction of the interim foodwaste facility with 250 wet tons per day capacity will require complete and timely applications for permit to construct and operate. Any grinders and separators that are not in line with the processing system may also need their own permits.
 - d) The proposed construction of any odor control treatment systems at the interim foodwaste facility will require complete and timely applications for permit to construct and operate.
 - e) The proposed alteration/modification of the existing foodwaste facility at Plant No. 2 will require complete and timely applications for permit to construct and operate. Any grinders and separators that are not in line with the processing system may also need their own permits.
 - f) The proposed construction or alteration of any odor control treatment systems at the modified Plant No. 2 will require complete and timely applications for permit to construct and operate.

Should there be any questions on the permits and compliance requirements for the Proposed Project, please contact the SCAQMD's Engineering and Permitting staff, Mr. Charles Tupac, Supervising Air Quality Engineer, at (909) 396-2684. For more general information on permits, please visit the SCAQMD's webpage, at: <http://www.aqmd.gov/home/permits>.

Compliance with SCAQMD Rules and Regulations

3. The Final PEIR should discuss how the Lead Agency will comply with the applicable SCAQMD rules and regulations, including, but are not limited to, the following:
 - a. Rule 201: Permit to Construction
 - b. Rule 203: Permit to Operate
 - c. Rule 212: Standards for Approving Permits and Issuing Public Notice
 - d. Rule 401: Visible Emissions
 - e. Rule 402: Nuisance
 - f. Rule 403: Fugitive Dust
 - g. Rule 1166: Volatile Organic Compound Emissions From Decontamination of Soil
 - h. Regulation 13: New Source Review
 - i. Rule 1401: New Source Review of Toxic Air Contaminants
 - j. Rule 1403: Asbestos Emissions from Demolition/Renovation Activities
 - k. Regulation 30: Title V Permits

Odor Management

Odor management methods include, but not limited to, utilizing the misting systems and odor neutralizers or other additives. Odor neutralizers or other additives may contain Volatile Organic Compounds and toxic compounds. If using these products are reasonably foreseeable odors management methods for the Proposed Project, and to facilitate a good-faith effort at full disclosure during the CEQA process (CEQA Guidelines Section 15003(i)), the Lead Agency should calculate the air emissions and include them in the Proposed Project's operational emissions in the Final PEIR, or demonstrate in the Final PEIR that the odor neutralizing products used in the proposed odor misting systems will have no adverse environmental impacts because the formulations will be free of toxic compounds, VOC, and fragrances.