



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Headworks Rehabilitation at Plant No. 1 (Project No. P1-105)

South Coast Air Quality Management District (South Coast AQMD) 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 MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 39,047 square feet of structures, construct 10 facilities totaling 43,500 square feet, and rehabilitate 11 structures on seven acres (Proposed Project). The Proposed Project is located at 10844 Ellis Avenue within the 112-acre wastewater treatment Plant No. 1. Construction of the Proposed Project is expected to last approximately eight years¹.

Responsible Agency, South Coast AQMD Permits, and Rules

Operation of portable engines and portable equipment units of 50 horsepower or greater that emit particulate matter require a permit from South Coast AQMD or registration with the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)². It is recommended that the Lead Agency consult with South Coast AQMD's Engineering and Permitting staff to determine if any equipment during construction and/or operation will require a South Coast AQMD permit or need to be registered under the PERP through CARB³, and if the Proposed Project would be subject to any South Coast AQMD rules in addition to South Coast AQMD Rule 201 – Permit to Construct and Rule 203 – Permit to Operate. If a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. The assumptions in the air quality analysis in the Final MND will be used as the basis for permit conditions and limits. If there is any information in the permitting process suggesting that the Proposed Project would result in significant adverse air quality impacts not analyzed in the Final MND or substantially more severe air quality impacts than those analyzed in the Final MND, the Lead Agency should commit to re-evaluating the Proposed Project's air quality impacts through a CEQA process (CEQA Guidelines Section 15162). For more information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein

¹ MND. Page 11.

² South Coast AQMD. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

³ *Ibid*.

prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details 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 do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS
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