



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Draft Program Environmental Impact Report (Draft PEIR) for the Proposed Coachella Valley Water District Sanitation Master Plan Project (SCH No.: 2019090307)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments include recommended revisions to the air quality analysis and South Coast AQMD rules and permits that the Lead Agency should discuss and address in the Final PEIR.

### South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to develop programs and strategies to guide refurbishment of existing wastewater treatment infrastructure and related systems, optimize operations, and meet the projected capacity needs of all sanitation facilities with a planning horizon of 2040 (Proposed Project). The Proposed Project would be located at various sites throughout the 1,000-square-mile service area within Riverside and Imperial counties, including Water Reclamation Plants (WRPs) 1, 2, 4, 7, and 10. The Proposed Project will include 133 Collection System and Water Reclamation Plant Capital Improvement Projects (CIP), which are divided into 12 categories/projects. Construction of the Proposed Project is assumed to take place over a 19-year period through 2040<sup>1</sup>. Operation of the Proposed Project is anticipated to include operation of stationary source equipment such as odor control systems, generators, and anaerobic digesters<sup>2</sup>.

### South Coast AQMD Staff's Summary of the CEQA Air Quality Analysis

In the Air Quality Analysis of the Draft PEIR, the Lead Agency quantified the Proposed Project's maximum daily construction emissions from seven of 12 categories/projects and qualitatively evaluated air quality impacts from the remaining five categories/projects. Among the seven categories/projects that the Lead Agency quantitatively analyzed in the Draft PEIR, one category/project (WRP 1) is not located within the South Coast AQMD's jurisdiction. Construction emissions from the remaining six categories/projects that are located within the South Coast AQMD's jurisdiction were compared to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized construction and operational air quality impacts would be less than significant<sup>3</sup>. No construction or operational mitigation measures were included<sup>4</sup>. Furthermore, in the Draft PEIR, the Lead Agency discussed applicable

<sup>1</sup> Draft EIR. Introduction. Page 1-2.

<sup>2</sup> Draft EIR Project Description. Pages 3.21 to 3.63.

<sup>3</sup> Draft EIR. Section 4.1 Air Quality. Page 4.1-42.

<sup>4</sup> *Ibid.* Pages 4.1-52 to 4.1-53.

South Coast AQMD Rule<sup>5</sup> 201 – Permit to Construct<sup>6</sup>, Rule 203 – Permit to Operate<sup>7</sup>, Rule 402 – Nuisance<sup>8</sup>, Rule 403 – Fugitive Dust<sup>9</sup>, Rule 403.1 – Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources<sup>10</sup>, and Rule 1401 – New Source Review of Toxic Air Contaminants<sup>11</sup>.

### South Coast AQMD Staff’s Comment on Overlapping Construction and Operational Air Quality Impacts

Based on a review of the Air Quality Analysis in the Draft PEIR, South Coast AQMD staff found that the Lead Agency did not analyze a scenario where construction activities overlap (e.g., construction of some components of the Proposed Project may overlap with other components) or a scenario where construction activities overlap with operational activities (e.g., some components of the Proposed Project may be operational as early as 2022 while some other components may be under construction until 2040). Since construction of the Proposed Project is expected to occur over a 19-year period from 2021 to 2040, and some components of the Proposed Project may be operational as early as 2022, it is reasonably foreseeable that construction activities may overlap as well as construction and operational activities. If these overlapping scenarios are reasonably foreseeable at the time the Draft PEIR was prepared, to conservatively analyze a worse-case air quality impact scenario, South Coast AQMD staff recommends that the Lead Agency use its best efforts to identify overlapping construction activities and overlapping construction and operational activities. Emissions from overlapping construction activities (including emissions from demolition) should be combined to be compared to South Coast AQMD’s air quality CEQA construction thresholds of significance in the Final PEIR. Emissions from overlapping construction and operational activities should also be combined to be compared to South Coast AQMD’s air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final PEIR. If the air quality analysis from overlapping scenarios is not included in the Final PEIR, the Lead Agency should provide reasons for not including the analysis supported by substantial evidence in the record.

### Responsible Agency, South Coast AQMD Rules, and Permits

In addition to South Coast AQMD Rules 201, 203, 402, 403, 403.1, and 1401, the Proposed Project may be subject to the requirements of the following South Coast AQMD rules and regulations, which the Lead Agency should discuss in the Final PEIR. Information on each of the rules and regulations is available on South Coast AQMD’s website at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book>.

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<sup>5</sup> *Ibid.* Pages 4.1-13 to 4.1-14.

<sup>6</sup> South Coast AQMD Rule 201 – Permit to Construct. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

<sup>7</sup> South Coast AQMD Rule 203 – Permit to Operate. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

<sup>8</sup> South Coast AQMD Rule 402 – Nuisance. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

<sup>9</sup> South Coast AQMD Rule 403 – Fugitive Dust. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>10</sup> South Coast AQMD Rule 403.1 - Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403-1.pdf>.

<sup>11</sup> South Coast AQMD Rule 1401 – New Source Review of Toxic Air Contaminants. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>.

- Rule 401 – Visible Emissions
- Rule 431.2 – Sulfur Content of Liquid Fuels
- Rule 1113 – Architectural Coatings
- Rule 1166 – Volatile Organic Compound Emissions from Decontamination
- Rule 1179.1 – NO<sub>x</sub> Emission Reductions from Combustion Equipment at Publicly Owned Treatment Works Facilities
- Regulation XIII – New Source Review
- Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines

In the Draft PEIR, the Lead Agency identified South Coast AQMD as a Responsible Agency for the Proposed Project since implementation of the Proposed Project will require permits from South Coast AQMD<sup>12</sup>. However, at the time of the release of the Draft PEIR, South Coast AQMD has not received permit applications related to the Proposed Project. Since the Proposed Project may include modifications to existing equipment, installation of new equipment or air pollutant control systems, and new or replacement engines, the Proposed Project may be required to submit complete and timely permit applications to South Coast AQMD for the following equipment:

- Applications for Permit to Construct and Permit to Operate will be required for changes to sewage treatment plant(s) that go beyond identical replacement. Proposed CIP at WRPs 4, 7, and 10 includes various modifications and additions to the sewage treatment plant, including an expansion of treatment capacity. While the proposed modifications described within CIP at WRP 2 may be identical replacements and repairs and may not require applications for permits, non-identical replacements will require applications for Permit to Construct and Permit to Operate.
- Applications for Permit to Construct and Permit to Operate will be required for any proposed new or reconstructed odor control/scrubber systems, unless exempted by South Coast AQMD Rule 219. The Proposed Project involves the addition of odor control systems for both the headworks facility and solids handling equipment at WRP 10. The Proposed Project also includes the addition of new blowers at WRP 4. It is unclear from the Draft PEIR if these blowers at WRP 4 refer to any additional odor control equipment or existing equipment, separate applications for Permit to Construct and Permit to Operate will be required.
- Applications for Permit to Construct and Permit to Operate will be required for any proposed new odor control units within the collection system/pump stations/lift stations not exempted by South Coast AQMD Rule 219.
- Applications for Permit to Construct and Permit to Operate will be required for any proposed chemical storage tanks not exempted by South Coast AQMD Rule 219.

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<sup>12</sup> Draft EIR. Introduction. Page 2-4.

- Applications for Permit to Construct and Permit to Operate will be required for engines rated above 50 brake horsepower (BHP). According to the Draft PEIR, improvement projects at WRP 10 include the replacement of backup generators, which may use engines rated above 50 BHP.
- In addition to increases to the million gallon per day capacity of WRP 4, the expansion includes addition of two new anaerobic digesters, which may require installation of other combustion equipment and emission sources such as digester gas flares, boilers, and/or engines to combust the produced digester gas. Applications for Permit to Construct and Permit to Operate will be required for combustion equipment.
- The Proposed Project includes on-site pilot testing of the SHINCCI Heat Pump Dryer at WRP 10 through the use of SHINCCI USA's mobile demonstration unit. Applications for Permit to Construct and Permit to Operate will be required for this equipment.

It is important that permits are fully and adequately evaluated in the Final PEIR as required under CEQA Guidelines Section 15096(b). It is also important to note that the assumptions in the air quality analysis in the Final PEIR will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. Question on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

#### Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD 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, informative, or useful to decision makers and to 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 Alina Mullins, Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov) if you have questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM/AS  
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