



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

September 6, 2024

BUEROH@ranchowater.com

Phillip Dauben, Principal Engineer
Rancho California Water District
42135 Winchester Road
Temecula, CA 92590

**Mitigated Negative Declaration (MND) for the Carancho Pump Station
Expansion and Improvement [Project No. D2048] (Proposed Project)
(SCH No. 2024080364)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The Rancho California Water District (RCWD) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on information provided in the MND, the Proposed Project consists of construction and operation of improvements and expansions to the 6.56-acre Carancho Pump Station located approximately 1,030 feet north of the El Calamar Road and Carancho Road intersection in unincorporated Western Riverside County.^{1, 2, 3} The Carancho Pump Station was originally built in 1978 and has a current water pumping capacity of 1,450 gallons per minute (gpm).^{4, 5} The Lead Agency has identified a need to expand the Carancho Pump Station capacity to 4,400 gpm in order to reduce a bottleneck in the delivery of potable water.⁶ The Proposed Project will also improve Carancho Pump Station's reliability by providing the pump station with emergency back-up power via installation of a new 1,250 kilowatt (kW) power generator.⁷ The Proposed Project will, among other tasks, demolish two existing inactive steel tanks, replace two existing 350 horsepower (HP) pumps, install two new 350 HP pumps (for a total of four new pumps within the existing pump station), abandon an existing transformer, install a new transformer, remove and replace existing pipeline, install two new surge tanks, and install the aforementioned new emergency power generator.^{8, 9} Construction is anticipated to commence in late 2024, last 18 months, and conclude in mid 2026.¹⁰ The Lead Agency does not anticipate that additional

¹ Draft Initial Study/Mitigated Negative Declaration for the Carancho Pump Station Expansion and Improvement [Project No. D2048] (IS/MND). 2.0 Introduction. Page III.

² *Ibid.* 3.0 Project Description. Figure 2, Local Vicinity Map.

³ *Ibid.* 3.0 Project Description. Page X.

⁴ *Ibid.*

⁵ *Ibid.* Page IX.

⁶ *Ibid.*

⁷ *Ibid.*

⁸ *Ibid.* Page XI.

⁹ *Ibid.* Page IX.

¹⁰ *Ibid.* Page XII.

employees or worker trips will be needed for the operation phase of the Proposed Project because long-term maintenance and management will be similar to existing conditions.¹¹

South Coast AQMD Staff's Comments on the MND

Proposed Project Likely Subject to the Following Permitting and Compliance Requirements:

1. During any activities capable of generating fugitive dust including but not limited to earthmoving activities, actions to prevent, reduce, or mitigate fugitive dust emissions for compliance with South Coast AQMD Rule 403 – Fugitive Dust may be required.
2. Excavation/grading work associated with preparation and/or construction of the project may be subject to South Coast AQMD Rule 1166 – Volatile Organic Compound (VOC) Emissions from Decontamination of Soil and as such may require a Rule 1166 VOC contaminated soil mitigation plan. In addition, if certain toxic air contaminants are identified in the soil, compliance with South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants may also be required.
3. New application for Permit to Construct and/or Operate for emergency generator if the engine is rated above 50 BHP.

In addition to the aforementioned South Coast AQMD Rules 403, 1166, and 1466, the following South Coast AQMD rules and regulations are the most pertinent to the Proposed Project and include but are not limited to: Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, Rule 401 – Visible Emissions, Rule 402 – Nuisance, Rule 403 – Fugitive Dust, Rule 407 – Liquid and Gaseous Air Contaminants, Rule 431.2 – Sulfur Content of Liquid Fuels, Rule 1110.2 – Emissions from Gaseous - and Liquid-Fueled Engines, Rule 1113 – Architectural Coatings, Rule 1143 – Consumer Paint Thinners and Multi-Purpose Solvents, Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations, Regulation XIII – New Source Review, Rule 1401 – New Source Review of Toxic Air Contaminants, Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities, and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines.¹²

South Coast AQMD Air Permits and Role as a Responsible Agency

As mentioned earlier, Staff notes that the Proposed Project will be equipped with a new emergency generator rated at 1,250 kW. If implementation of the Proposed Project would require the use of new stationary sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD may change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the

¹¹ *Ibid.* 3.0 Project Description. Page XIII.

¹² South Coast AQMD Rule Book, <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book>.

applications for air permits. For these reasons, the Final MND should include a discussion about any new stationary equipment requiring South Coast AQMD air permits and, if applicable, identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final MND should also include calculations and analyses for construction and operation emissions for any new stationary sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting water purveyor staff at (909) 396-3627 for questions regarding what types of equipment would require applications for new air permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

Staff recommends the Lead Agency revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and 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 and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted should be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. 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 Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:AS:EA
RVC240809-02
Control Number