



South Coast Air Quality Management District

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Draft Program Environmental Impact Report (Draft PEIR) for the Proposed Integrated Master Plan for Wastewater Collection and Treatment Facilities

The South Coast Air Quality Management District (AQMD) 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 the Recirculated or Final Program Environmental Impact Report (PEIR).

Localized AQ Impacts

In Section 1.1, the Lead Agency states that the Draft PEIR contains a project specific analysis of Phase I and program level analysis for additional program activities. No further CEQA document is expected to be distributed for Phase I in the future based on a telephone conversation with Lead Agency staff. AQMD staff is concerned that project related local impacts are not fully disclosed in the Draft PEIR.

On page 3.2-31, the Lead Agency states that the nearest sensitive receptors are located over 1,500 feet west of the proposed construction areas, however Figure 2-7 (Additional Construction Areas for Maximum with PRD Buildout Scenario) shows that the proposed Sludge Bed Area site is less than a quarter mile from those sensitive receptors. As the proposed project will increase total activities at the entire facility, increased emissions from the entire facility should be presented in either the Recirculated or Final PEIR.

The AQMD staff recommends that the Lead Agency conduct a localized significance analysis for construction and operational air quality impacts from sources that are less than a quarter mile from sensitive receptors. Quantified air emissions should be presented to demonstrate that construction and operational air quality impacts are less than significant rather than relying on compliance with air emissions permit limits. The air emissions permit limits do not disclose all project specific emission sources, e.g., demolition and off-site debris disposal, soil disturbance during excavation and grading, facility construction, vehicle emissions from on-site equipment, employee trips as well as the emissions from the proposed facility. These project specific emissions from both localized and regional construction and operational air quality impacts should be quantified and then compared with the respective localized and regional thresholds. In

addition, compliance with AQMD permitting requirements does not necessarily demonstrate that all project emissions will be lower than CEQA significance thresholds.

SCAQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.¹ Should the Lead Agency conclude after its analyses that construction or operational localized air quality impacts exceed the SCAQMD daily significance thresholds, all feasible mitigation measures should be considered to reduce impacts to a less than significant level. Some construction related measures are available on the AQMD website.³

Permitting

Based on the project description, the current sewage treatment permit allows a maximum flow rate of 40 million gallons per day (mgd). In order to increase flows to the proposed volume of up to 63.9 mgd included in the project description, the project applicant needs to apply for permits to construct modifications with the AQMD. Separate applications are required for modification to the waste water treatment equipment, each air pollution control system, internal combustion engines, the biogas handling system, and any combustion equipment that will burn digester gas.

In addition, Table 3.2-8 (Change in Operational Emissions of Criteria Pollutants) of the Draft PEIR should indicate if the stated actual criteria pollutants for 2009 were reported in the annual emissions inventory report to the AQMD and subsequently audited. As indicated in the note below Table 3.2-8, the projected criteria emissions are projected to be proportional to the influent flow rate. Since the projected maximum facility-wide emissions of NO_x and ROG are both estimated to be greater than 10 tons per year, the Final PEIR should indicate that the facility will be required to file for a Title V facility permit with the AQMD, and that the equipment modification must comply with current best available control technology or lowest achievable emission rate for all criteria pollutants which are increased by the proposed project.

Greenhouse Gas Thresholds

The Lead Agency presents significance thresholds for greenhouse gases (GHG) on page 3.2-22. These thresholds require that the project:

- A) be consistent with CARB's state GHG Scoping Plan,
- B) not exceed the stationary source reporting limit of 25,000 MT/yr CO₂e,
- C) meet energy efficiency standards, and
- D) be consistent with any local GHG plans.

The Lead Agency then uses these thresholds to conclude that this project will have a less than significant GHG impact. AQMD staff is concerned that the Lead Agency has not demonstrated the appropriateness of this threshold. In addition, the project-level analysis

¹ <http://www.urbemis.com/>

² <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

in the Draft PEIR does not present enough information to conclude that impacts fall below these significance thresholds.

The threshold of 25,000 MT/yr CO₂e utilized in this analysis is not consistent with AQMD's preferred threshold of 10,000 MT/yr CO₂e for industrial sources.² The rationale cited for utilizing 25,000 MT/yr CO₂e is that 94% of all stationary sources emissions in California are from facilities that emit GHGs greater than this quantity. However, the 25,000 MT/yr CO₂e value was not developed for use as a CEQA threshold pursuant to CEQA Guidelines 15064.7. Indeed, although CARB specified a reporting threshold of 25,000 MT/yr CO₂e, it has considered adopting a much lower threshold (7,000 MT CO₂e) for CEQA purposes.³ Therefore, AQMD staff recommends that the Lead Agency utilize a threshold that complies with CEQA Guidelines 15064.7 (such as AQMD's threshold).

Further explanation is also necessary to demonstrate that the proposed project is consistent with the CARB Scoping Plan. For example, in Table 3.2-4 of the Draft PEIR, there are several water-related measures, including increased conservation, efficiency, and recycling efforts that would reduce the need for a larger wastewater system. The Draft PEIR does not describe alternatives that would be consistent with these water measures contained in the CARB Scoping Plan. As the project only expands wastewater operations, the Lead Agency has not demonstrated that GHG impacts are less than significant. AQMD staff recommends that the Lead Agency present additional information addressing how the project complies with the CARB Scoping Plan.

Greenhouse Gas Quantification

AQMD staff is concerned that the quantification of GHGs in the Draft PEIR is unclear, and may underestimate impacts. For example, page 3.2-34 states that the GHG calculations are presented in Appendix B, however they are not included in the published appendix. These calculations should be presented in either the Recirculated or Final PEIR. Without these calculations, it is difficult to determine the project related GHG emissions. For example, on page 3.2-34 the Lead Agency states that the worst case construction year GHG emissions will be 9,104 MT CO₂e, however on page 3.2-35 an estimate of 47 MT/yr CO₂e is presented assuming a 30 year amortization of construction emissions. As 9,104 MT CO₂e is only one year of emissions, and construction is projected to last at least 15 years, the 47 MT/yr CO₂e value appears to be considerably underestimated.

The operational GHG emissions are also difficult to evaluate based on the presentation in the Draft PEIR. Conflicting facility operational emissions present an unclear sum of total facility emissions (e.g., 9,057/yr MT CO₂e on page 3.2-34 vs. 5,175 MT/yr CO₂e on page 3.2-35). Also, as the facility will use 5.9 MW of electricity, including either 2.7 or 1.5 MW of grid-based electricity (depending on whether a new cogeneration facility is built), the GHG emissions from this electricity generation need to be clearly presented in the Recirculated or Final PEIR.

² <http://www.aqmd.gov/ceqa/handbook/GHG/GHG.html>

³ <http://www.arb.ca.gov/cc/localgov/ceqa/ceqa.htm>

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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Planning, Rule Development & Area Sources

Attachment

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