



South Coast Air Quality Management District

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E-Mailed: August 30, 2012
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Mr. Paul Weghorst
Director of Water Resources
Irvine Ranch Water District
15600 San Canyon Ave
Irvine, CA 92618

Review of the Draft Supplemental Environmental Impact Report (Draft SEIR) for the Michelson Water Recycling Plant Phase 2 & 3 Capacity Expansion Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The AQMD staff also appreciates that the project proponent consulted with us in a meeting in May 2011 to discuss this project. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft Supplemental Environmental Impact Report (Draft SEIR) the lead agency has not provided sufficient technical information to determine the potential air quality impacts from the proposed project. Also, the lead agency has provided limited discussion to substantiate the Draft SEIR's treatment of baseline activities. Therefore, the AQMD staff recommends that the lead agency provide additional information in the Final EIR that addresses these concerns. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any

other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

ORC120705-03
Control Number

Peak Daily Operational Emissions

1. In Table 3.2-7 of the Draft SEIR the lead agency presents the project's peak daily operational emissions from the project, however, based on recent information provided in the project's permit application file it is not clear that the Draft SEIR captures the project's potential maximum daily air quality impacts. For example, based on information provided to the AQMD's engineering staff the maximum daily uncontrolled NOx emissions from the project are 66.84 pounds per day (lbs/day). However, the peak daily NOx emissions value reported in Table 3.2-7 is 61 lbs/day from the following emissions sources: dryers, flares, boilers, emergency generators, micro turbines and a thermal oxidizer. The lead agency should ensure that the Draft SEIR discloses the project's maximum daily operational air quality impacts, at a minimum. The Draft SEIR should also discretely identify all of the project's emissions from permitted stationary source equipment, mobile source equipment, and any other sources.
2. Mobile Source Emissions Baseline

The project's peak daily mobile source emissions reported in Table 3.2-7 and Table 3.6-2 of the Draft SEIR appear to include existing transportation activity associated with the Los Alisos Water Recycling Plant (LAWRP) and the Orange County Sanitation District (OCSD) in the baseline. Based on discussion provided in the Draft SEIR it appears that the lead agency assumed that the proposed project will replace biosolid processing activity that is occurring at OCSD and a facility in Arizona, and that this baseline activity will cease with the project. As a result, the lead agency subtracts the emissions from this baseline activity from the project's emissions. However, the lead agency does not provide the transportation emissions methodology in Appendix C of the Draft SEIR nor does it provide substantial evidence demonstrating that reduced operations at OCSD will not be replaced to maintain existing capacity. As was discussed in the consultation meeting last year, if the baseline emissions are subtracted from project emissions, then a robust description is needed to justify the assumption that baseline emissions will not be continued in the future. Therefore, the lead agency should provide sufficient technical information in the Final EIR to demonstrate that it is appropriate to assume that all baseline activity will cease in the future

3. Permitted Equipment

AQMD staff may have additional comments on the emissions analysis conducted for air quality permits. These comments will be made as part of the permitting process. Engineering and Compliance staff can be reached at (909) 396-2737 regarding the permit application.