South Coast
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E-mailed: June 18, 2010 June 18, 2010

Mr. Ricky Ramos
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648

Review of the Subsequent Draft Environmental Impact Report (Draft EIR) for the Seawater Desalination Project at Huntington Beach

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. 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.

AQMD staff is concerned about the potential localized and regional air quality impacts during construction of the proposed project. Therefore, pursuant to CEQA Guidelines §15370 AQMD staff recommends that the lead agency require additional mitigation measures, which could minimize or eliminate potential air quality impacts from construction of the proposed project. AQMD staff also notes that the lead agency did not adequately disclose potential air quality impacts from some activities during operation of the project including routine maintenance of emergency generators that will operate in close proximity to homes, and potential emissions from chemical and fuel storage tanks. AQMD staff therefore recommends that the lead agency present a more robust discussion of direct emissions from the project, and consider mitigation measures if impacts are found to be significant.

Staff is available to work with the lead agency to address these issues and any other questions that may arise. 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 EIR. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

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

Attachment

IM:DG
ORC100507-06

AIR QUALITY CONSTRUCTION ANALYSIS AND MITIGATION

Tank Demolition Process

1. On pages four and five in Section 4.9 (Construction Related Impacts) in the Subsequent Draft EIR the lead agency briefly described the demolition process planned for the existing on-site fuel oil storage tanks. Based on this brief description AQMD staff is concerned about the possibility of odors from demolition and dismantling of the on-site fuel oil storage tanks. Therefore, AQMD staff requests that the lead agency provide further details on the tank demolition process and any measures intended to prevent potential odors from this process. Also, in the Final EIR the lead agency should provide specific information regarding compliance with all applicable AQMD rules such as 1149 – Storage Tank and Pipeline Cleaning and Degassing, 1403 - Asbestos Emissions from Demolition/Renovation Activities, and 1166 - Volatile Organic Compound Emissions from Decontamination of Soil.

Regional NOx and Localized PM10 and PM2.5 Mitigation Measures

2. On pages 28 through 33 in Section 4.9 (Construction Related Impacts) the lead agency evaluated air quality impacts from criteria pollutants during construction of the proposed project. Many of the on-site and off-site construction activities will occur in close proximity (within 25 meters) to sensitive receptors (i.e. residences). The lead agency's air quality analysis demonstrates that Particulate Matter (PM10 and PM2.5) emissions exceed the AQMD's localized construction significance thresholds and Oxides of Nitrogen (NOx) emissions exceed the AQMD's regional construction significance threshold. Therefore, AQMD staff recommends that the lead agency consider adding the following mitigation measures to further reduce PM10, PM2.5, and NOx air quality impacts from the construction phase of the project, if not otherwise implemented by the requirements of Rule 403:

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
- Configure construction parking to minimize traffic interference;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Suspend all excavating and grading operations when wind gusts (as instantaneous gusts) exceed 25 mph;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable;

- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
- All streets shall be swept at least once a day using SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water);
- Replace ground cover in disturbed areas as quickly as possible;
- Water active sites at least twice daily;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- Require all on-site and off-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:
  - ✓ April 1, 2010, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

❖ For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

AIR QUALITY OPERATIONAL EMISSIONS ANALYSIS

Quantification of Emissions from Offsite Diesel Powered Electrical Generators

3. On pages 70 and 71 in Section 3.0 (Project Description) of the Subsequent Draft EIR the lead agency mentioned that the proposed project will include four offsite diesel powered electrical generators (Caterpillar Model 3516 or similar units) for emergency back-up purposes. However, the lead agency failed to quantify potential emissions from these four off-site generators. Given the proximity of each generator to residences, the engine specifications for the generators, and the extent of use required for routine maintenance at each site, AQMD staff is concerned about potential additional air quality impacts. As a result, AQMD staff recommends that the lead agency use dispersion modeling to quantify the potential air quality impacts from short term operations of the generators. These emissions should be compared to applicable Ambient Air Quality Standards (AAQS) such as the 1-hr NO2 AAQS. If localized impacts are found to be significant, then the lead agency should consider mitigation measures such as higher tiered generators, or allowing only one generator to operate at a time during routine maintenance and testing.

Also, the lead agency should be aware that the Caterpillar Model 3516 cited in the Subsequent Draft EIR does not appear to meet the Air Toxic Control Measure (ATCM) for stationary compression ignition emissions. In the Final EIR, the lead agency should provide further information detailing how the generators will comply with this ATCM.

Additional Information for Storage Tanks

4. In the Subsequent Draft EIR the lead agency describes the future use of various storage tanks including for diesel fuel, ammonia, and fluorosilicic acid. However, the lead agency provides little information regarding potential air quality impacts from these tanks. Therefore, AQMD staff requests that the lead agency provide additional information in the Final EIR on the potential use and maintenance of the tanks and address any pertinent air quality impacts that may result from these activities. This additional discussion should also present applicable air quality regulations that may apply to these tanks including Rule 1470-Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines and Rule 431.2-Sulfur Content of Liquid Fuels.