



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Wells No. 12 and No. 14 Pipeline Project

South Coast Air Quality Management District (SCAQMD) staff 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 the Final MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct two potable water wells and 4,500 linear feet of pipelines on 0.89 acres (Proposed Project). The Proposed Project is located at 4011 West Chandler Avenue and 3120 South Croddy Way on the northwest corner of West MacArthur Boulevard and South Harbor Boulevard in the City of Santa Ana. Construction of the Proposed Project is expected to last 20 months, starting in January 2020 and will involve demolition of two existing office/storage buildings¹.

Permits and Compliance with SCAQMD Rules

Since the Proposed Project includes, among others, construction and operation of two on-site aqueous ammonia storage tanks and two on-site, 500 horsepower diesel-fueled emergency generators², permits from SCAQMD will be required, and SCAQMD should be identified as the Responsible Agency for the Proposed Project in the Final MND. In addition to a discussion of compliance with SCAQMD Rules 403 – Fugitive Dust and 1403 – Asbestos Emissions from Demolition/Renovation Activities, the Lead Agency should include a discussion to demonstrate compliance with applicable SCAQMD Rules, including, but not limited to, Rule 201 – Permit to Construct³, Rule 203 – Permit to Operate⁴, Rule 401 – Visible Emissions⁵, Rule 402 – Nuisance⁶, Regulation 13 – New Source Review⁷, Rule 1401 – New Source Review of Toxic Air Contaminants⁸, and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines⁹ in the Air Quality Section of the Final MND.

¹ MND, Section 2.2. *Project Description*. Page 2-3 – 2-4.

² *Ibid.* Pages 2-5 – 2-11.

³ South Coast Air Quality Management District. Rule 201 – Permit to Construct. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

⁴ South Coast Air Quality Management District. Rule 203 – Permit to Operate. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

⁵ South Coast Air Quality Management District. Rule 401 – Visible Emissions. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>.

⁶ South Coast Air Quality Management District. Rule 402 – Nuisance. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

⁷ South Coast Air Quality Management District. Regulation 13 – New Source Review. Accessed at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>.

⁸ South Coast Air Quality Management District. 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>.

⁹ South Coast Air Quality Management District. Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>.

Furthermore, due to the light industrial historical usage of the site¹⁰, if during soil disturbing activities such as grading, petroleum hydrocarbons may be encountered that will cause volatile organic compounds to become airborne, the Lead Agency should include a discussion to demonstrate compliance with SCAQMD Rule 1166 – Volatile Organic Compounds Emissions from Decontamination of Soil¹¹ and SCAQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants¹² in the Air Quality Section of the Final MND. Any assumptions used in the Air Quality Analysis in the Final MND will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact the SCAQMD’s Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit SCAQMD’s webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

Pursuant to 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. Please provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details 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 do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD 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, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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¹⁰ MND. Section 3.4.8 *Hazards and Hazardous Materials*. Page 3-34.

¹¹ South Coast Air Quality Management District. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

¹² South Coast Air Quality Management District. Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.