



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed IRWD Baker Water Treatment Plant

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 the Final CEQA document.

In the project description, the lead agency proposes construction at multiple sites. At the Baker Water Treatment Plant (Baker WTP), the lead agency proposes the demolition of two small buildings and a 3.4 million gallon water reservoir. The Baker WTP would also include construction of the Raw Water Conveyance Facilities (including 1,100 linear feet of pipeline); Treatment Facilities; Treated Water Facilities; and Emergency Overflow Facilities. The total amount of building debris would be approximately 10,000 cubic yards and the total building area would be about 26,250 square feet. Construction of 2,500 linear feet of sewer pipeline along Serrano Creek Trail would also occur. Both the treated water pipeline and the sewer pipeline construction would occur adjacent to residential areas. At a second site, the Raw Water Pump Station, construction activities would include minor demolition, excavation and construction with an approximate one-acre construction footprint.

In the Draft EIR on page 2-17, the lead agency also cites compliance with the following AQMD Rules 201 and 203: Permit to Construct and Permit to Operate. Based on the project description, permit applications would be required for the proposed disinfection facility, chemical storage, and standby generators. In addition, permits may also be required for the stored chemicals: aqueous ammonia, ferric chloride, hydrochloric acid and citric acid. In addition to permits, the lead agency should also include operational emission estimates from storage and use (disinfection) of the above chemicals along with the emissions from the lead agency's estimate of 20-50 hours per year from the standby generators. These generators would be operated during regular maintenance even if the water plant is not used. These emission estimates, along with any emission factors, methodologies used, equations, etc., should be included in the Final EIR. Questions regarding permits can be directed to AQMD staff at (909) 396-2684.

In addition to evaluating the above-mentioned air quality impacts, the AQMD recommends that the lead agency estimate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. It is noted in Figure 2-2 and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential property) north and west of the proposed Baker WTP proposed project site and north of the proposed Raw Water Pump Station. AQMD 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 AQMD daily significance thresholds, staff has compiled mitigation measures that can be implemented if the air quality impacts are determined to be significant.²

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 AQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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,



Ian MacMillan
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IM:GM

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¹ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

² http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html