



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

August 24, 2017

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## **Mitigated Negative Declaration (MND) for the Proposed Long Beach Municipal Urban Stormwater Treatment (MUST) Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is 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 and operate an 11.5-acre Municipal Urban Stormwater Treatment (MUST) plant, eleven conveyance facilities, and eleven conveyance pipelines/channel segments (Proposed Project). The MUST plant would also include the installation of two emergency diesel generators.

### SCAQMD Staff's Summary of Air Quality Analysis

In the air quality analysis, the Lead Agency only quantified the construction and operational emissions of the proposed MUST plant and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that regional and localized construction and operational emissions would be less than significant<sup>1</sup>. SCAQMD staff has comments on the air quality analysis. Details are included in the attachment.

Pursuant to the 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. SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR, at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

LAC170801-07

Control Number

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<sup>1</sup> Initial Study/Mitigated Negative Declaration. Section 4.3 Air Quality. Page 4.3-1.

**ATTACHMENT**

Air Quality Analysis

1. The air quality analysis only quantified the construction and operational emissions of the proposed MUST plant and did not include emissions from the construction and operation of the eleven conveyance facilities or the eleven conveyance pipelines/channel segments. The MND has likely underestimated the Proposed Project's air quality impacts. Therefore, SCAQMD staff recommends calculating emissions from the proposed conveyance system and including them in the Final MND.

SCAQMD Permits

2. Since implementation of the Proposed Project requires permits from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. Further, the Proposed Project will require the submittal of complete and timely permit applications for the following system and equipment:
  - 1) The stormwater collection/storage/treatment system, if not exempt under SCAQMD Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II.
  - 2) Emergency diesel backup generators greater than 50 horsepower.

Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-2388. For more general information on permits, please visit SCAQMD's webpage, at: <http://www.aqmd.gov/home/permits>.

Compliance with SCAQMD Rules

3. The Final MND should discuss how the Lead Agency will comply with applicable SCAQMD rules and regulations, including, but may not be limited to:
  - 1) Rule 201 – Permit to Construct
  - 2) Rule 203 – Permit to Operate
  - 3) Rule 402 – Nuisance
  - 4) Rule 1176 – VOC Emissions From Wastewater Systems
  - 5) Rule 1179 – Publicly Owned Treatment Works Operations
  - 6) Rule 1401 – New Source Review of Toxic Air Contaminants
  - 7) Regulation XIII – New Source Review