



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 Beaumont Wastewater Treatment Plant Upgrade/Expansion and Brine Disposal Pipeline Project

The 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 and Air Quality Analysis

The Lead Agency proposes to construct a 12-inch diameter brine waste disposal gravity pipeline extending 23 miles from the City of Beaumont Wastewater Treatment Plant north to the nearest connection point of the Inland Empire Brine Line that is located near the north side the E. Street Bridge in the City of San Bernardino (Proposed Project).

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. Based on the analyses, the Lead Agency found that the Proposed Project's NO_x emissions during construction would be 119.48 lbs/day¹, which exceeds SCAQMD regional air quality CEQA significance threshold of 100 lbs/day for NO_x. After incorporating Mitigation Measure (MM) AQ-1, the Lead Agency found that the construction emissions from NO_x would be reduced to 99.78 lbs/day, which is slightly below 100 lbs/day for NO_x for construction². MM AQ-1 requires the use of heavy-duty construction equipment over 75 hp that meet or exceed U.S. EPA Tier 3 engine standards³.

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP⁴ is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent reduction in NO_x emissions beyond 2031 levels for ozone attainment.

Achieving NO_x emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for before the 2023 and 2031 deadlines. SCAQMD is committed to attain the

¹ MND. Table 3.3. Pages 42 and 43.

² MND. Table 3.4. Page 45.

³ MND. Page 44.

⁴ South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

ozone NAAQS as expeditiously as practicable, and the Proposed Project plays an important role in supporting SCAQMD's commitment. As such, SCAQMD staff recommends changes to the existing MM AQ-1 to further reduce NOx emissions during the Proposed Project's construction phase. Please see the attachment for more information.

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 the 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 or useful to decision makers and to 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 me at lsun@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS

RVC180118-03

Control Number

ATTACHMENT**Mitigation Measures**

1. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce NO_x emissions during construction, SCAQMD staff recommends the following changes to the existing Mitigation Measure (MM) AQ-1 that the Lead Agency should include in the Final MND. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website⁵.

Recommended Changes to the Existing Mitigation Measure AQ-1

MM AQ-1. Certified Tier 3 Engines: During brine pipeline construction activities, all heavy-duty construction equipment over ~~75~~ 50 horsepower (hp) shall be certified to meet or exceed United States Environmental Protection Agency (USEPA) Tier ~~3~~ 4 engine standards. Proof of compliance shall be provided in the bid specifications and be verified by the Department of Public Works prior to issuance of construction. In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Project, and/or limiting the number of individual construction project phases occurring simultaneously.

⁵ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.