



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Odor Mitigation Project

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to contain and treat wastewater odors from the Western Riverside County Regional Wastewater Treatment Plant (WRCRWTP) by consolidating and relocating scrubber stacks from an existing chemical odor scrubber, and modifying an existing biofilter to vent and control odorous emissions from the facility's bio-reactor no. 1 cascading weir (Proposed Project). The Proposed Project is intended to mitigate odor complaints that have increasingly been reported to South Coast AQMD since the completion of a recent expansion at the WRCRWTP¹. The Proposed Project is located on the southwest corner of the intersection of River Road and Baron Drive within the City of Eastvale. Construction is anticipated to last 12 months, with operations beginning in March 2022². Based on a review of the MND and aerial photographs, South Coast AQMD staff found that existing residential uses are located immediately east of the Proposed Project³.

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section of the MND, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized air quality impacts would be less than significant⁴. In the MND, the Lead Agency stated that the Proposed Project would produce essentially no emissions during operation⁵.

¹ MND. Page 2

² MND. Page 3-41.

³ MND. PDF Page 117.

⁴ MND. Page 3-16.

⁵ *Ibid.*

Responsible Agency and South Coast AQMD Permits and Rules

Responsible Agency

South Coast AQMD is a Responsible Agency for the Proposed Project (CEQA Guidelines Section 15381) since implementation of the Proposed Project requires permits from South Coast AQMD. The Lead Agency should identify South Coast AQMD as a Responsible Agency in the Final MND.

South Coast AQMD Permits

In the MND, the Lead Agency states that the chemical odor scrubber consists of six 3-stage scrubber trains in parallel and that each train is sized for 17,500 cubic feet per minute (cfm) for a total capacity of 105,500 cfm⁶. However, the South Coast AQMD Permit Number G59926 for the Odor Control System no. 1 specifies the exhaust flow rate from each of the six scrubbers at a maximum capacity of 23,000 standard cubic feet per minute (scfm)⁷. South Coast AQMD staff will use the exhaust flow rate proposed in the application submittal to evaluate emissions calculations and health risk assessment.

South Coast AQMD received three permit applications (Application Number (A/N): 623330, 623331, and 623332) related to the Proposed Project at the WRCRWTP (South Coast AQMD Facility ID No.: 111176).

- Application Number (A/N) 623330 proposes to combine the six individual exhaust stacks into one stack relocated from the eastern side of the facility to the western side. In addition, the permit application requests an increase in the allowable stack concentration of hydrogen sulfide to 0.5 parts per million by volume (ppmv) from the currently limit of 0.15 ppm.
- Application Number (A/N) 623331 proposes to install a cover on the existing bio-reactor no. 1 cascading weir to capture and vent odorous emissions including hydrogen sulfide to an existing biofilter.
- Application Number (A/N) 623332 proposes to install a large blower motor and modify the ducting to the existing biofilter in order to allow venting of the cascading weir to the biofilter for odor control. The permit application will also increase gaseous flow through the biofilter by 600 cubic feet per minute (cfm).

It is important that the permits are fully and adequately evaluated in the Final MND as required under CEQA Guidelines Section 15096(b). It is also important to note that the assumptions in the air quality analysis and health risk assessment in the Final MND will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. Should there be any questions on permits, please contact Angela Shibata, Supervising Air Quality Engineer, at ashibata@aqmd.gov.

⁶ MND. Page 2-3.

⁷ South Coast AQMD Application Number 609131, Permit Number G59926, Facility ID 111176.

South Coast AQMD Rules

The MND included a discussion of South Coast AQMD Rule 402 – Nuisance⁸. The Proposed Project will also need to comply with South Coast AQMD Rule 201 – Permit to Construct⁹, Rule 203 – Permit to Operate¹⁰, Rule 401 – Visible Emissions¹¹, Rule 403 – Fugitive Dust¹², and Rule 1401 – New Source Review of Toxic Air Containments¹³ that the Lead Agency should discuss in the Final MND.

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 South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses 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.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:MI/AS:HM
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Control Number

⁸ South Coast AQMD. Rule 402 – Nuisance. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

⁹ South Coast AQMD. Rule 201 – Permit to Construct. <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

¹⁰ South Coast AQMD. Rule 203 – Permit to Operate. <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

¹¹ South Coast AQMD. Rule 401 – Visible Emissions. <http://www.aqmd.gov/docs/default-source/rule-book/outdated-sip-rules/rule-401-visible-emissions.pdf>

¹² South Coast AQMD Rule 403 – Fugitive Dust. <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

¹³ South Coast AQMD. 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>.