



Air Pollution Control District
San Luis Obispo County

April 24, 2015

Ms. Shawna Scott, Senior Planner
SWCA Environmental Consultants
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

SUBJECT: APCD Comments Regarding the Los Osos CSD 8th Street Well Project Initial Study / Mitigated Negative Declaration

Dear Ms. Scott:

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed project located at 8th Street and El Moro Avenue in Los Osos.

The Los Osos Community Services District has completed a Draft Initial Study/Mitigated Negative Declaration for the proposed 8th Street and El Moro Avenue Well Site Project. The proposed project includes: demolition of an existing well house, construction of a new Upper Aquifer well and installation of a pre-manufactured metal building (approximately 600 sq.ft.) to house the existing and proposed wells and if required, a skid mounted ion-exchange unit for nitrate removal. Installation of the ion-exchange unit would necessitate the installation of a 7,000 gallon above-ground storage tank for waste water (brine) storage, which would be emptied via tank truck 3 to 4 times weekly.

The following are APCD comments that are pertinent to this project.

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

CONSTRUCTION PHASE IMPACTS - Below Threshold

The Project Proponent evaluated the construction impacts of this project using the most recent CalEEMod computer model for estimating construction emissions related to the development of land uses. The modeling results indicate that the construction phase impacts will likely be less than the APCD's significance threshold values identified in Table 2-1 of the CEQA Air Quality Handbook (available at the APCD web site: slocleanair.org). However, the Project Proponent acknowledges that, due to the

close proximity of sensitive receptors, the project could potentially create air quality impacts through the generation of dust and diesel PM, and has proposed appropriate mitigation measures. **Therefore, with the exception of the requirements below, and the mitigation measures already included in the Mitigated Negative Declaration, the APCD is not requiring other construction phase mitigation measures for this project.**

Construction Scheduling

In addition to the mitigation measures included in the Initial Study on page 12, to further reduce construction activity impacts to the local school, APCD staff recommends the construction work be scheduled during a time when school is not in session.

Demolition of Asbestos Containing Materials

Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during the demolition or remodeling of existing buildings or the disturbance, demolition, or relocation of above or below ground utility pipes/pipelines (e.g., transite pipes or insulation on pipes). **If this project will include any of these activities, then it may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP).** These requirements include, but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at (805) 781-5912 and also go to slocleanair.org/business/asbestos.php for further information. To obtain a Notification of Demolition and Renovation form go to the "Other Forms" section of: slocleanair.org/business/onlineforms.php.

Dust Control Measures

APCD agrees with the dust control measures listed on page 12 of the Initial Study / Mitigated Negative Declaration. **However, since water use is a concern due to drought conditions, the contractor or builder shall consider the use of an APCD-approved dust suppressant where feasible to reduce the amount of water used for dust control.** For a list of suppressants, see Section 4.3 of the CEQA Air Pollution Control District Quality Handbook.

Construction Phase Idling Limitations

This project is in close proximity to nearby sensitive receptors (residences on all sides and Baywood Elementary School approximately 200' NE). **Projects that will have diesel powered construction activity in close proximity to any sensitive receptor shall implement the following mitigation measures to ensure that public health benefits are realized by reducing toxic risk from diesel emissions:**

Diesel Idling Restrictions Near Sensitive Receptors (residences on all sides and Baywood Elementary School approximately 200' NE)

In addition to the State required diesel idling requirements, the project applicant shall

comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:

- a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
- b. Diesel idling within 1,000 feet of sensitive receptors **shall not be permitted**;
- c. Use of alternative fueled equipment is recommended; and
- d. Signs that specify the no idling areas must be posted and enforced at the site.

Naturally Occurring Asbestos

Naturally occurring asbestos (NOA) has been identified by the state Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified areas throughout the County where NOA may be present (see the APCD's 2012 CEQA Handbook, Technical Appendix 4.4). If the project site is located in a candidate area for Naturally Occurring Asbestos (NOA), the following requirements apply. Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (93105), **prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if the area disturbed is exempt from the regulation. An exemption request must be filed with the APCD.** If the site is not exempt from the requirements of the regulation, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. More information on NOA can be found at <http://www.slocleanair.org/business/asbestos.php>

Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit.

The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2012 CEQA Handbook.

- Drilling rig;
- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Internal combustion engines;
- Unconfined abrasive blasting operations;
- Trommel screens; and,
- Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc).

To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

OPERATIONAL PHASE IMPACTS - Below Threshold

Based on the mitigated negative declaration operational phase emission estimates using the most recent CalEEMod computer model, the operational phase would likely be less than the APCD's

significance threshold values identified in Table 3-2 of the CEQA Air Quality Handbook. **Therefore, with the exception of the requirements below, and the mitigation measures already included in the Mitigated Negative Declaration, the APCD is not requiring other operational phase mitigation measures for this project.**

Truck Routing & Scheduling

Proposed truck routes should be evaluated and selected to ensure routing patterns have the least possible impact to residential dwellings and other sensitive receptors (e.g. Baywood Elementary School). To further reduce operational activity impacts to the local school, SLOCAPCD staff recommends the truck hauling trips be scheduled during a time when school is not in session.

Operational Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present at the site. Operational sources may require APCD permits. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendix, page 4-4, in the APCD's 2012 CEQA Handbook.

- Portable generators and equipment with engines that are 50 hp or greater;
- Chemical product processing and or manufacturing;
- Electrical generation plants or the use of standby generator;
- Internal combustion engines;

Most facilities applying for an Authority to Construct or Permit to Operate with stationary diesel engines greater than 50 hp, should be prioritized or screened for facility-wide health risk impacts. A diesel engine only facility limited to 20 non-emergency operating hours per year or that has demonstrated to have overall diesel particulate emissions less than or equal to 2 lb/yr does not need to do additional health risk assessment. **To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at vkirkhuff@co.slo.ca.us or 781-4247.

Sincerely,



Vince Kirkhuff
Air Quality Specialist

VJK/arr

cc: LOCS
Tim Fuhs, Enforcement Division, APCD
Gary Willey, Engineering Division, APCD