

Response to Comments

TREATMENT PLANT No. 2 HEADWORKS REPLACEMENT PROJECT

*Final Subsequent Environmental Impact Report
SCH# 2003051054*

April 2004

*Prepared for
Orange County Sanitation District*

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(415) 896-5900

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Suite 600
Oakland, CA 94612
(510) 839-5066

8950 Cal Center Drive
Building 3, Suite 300
Sacramento, CA 95826
(916) 564-4500

4221 Wilshire Boulevard
Suite 480
Los Angeles, CA 90010
(323) 933-6111

710 Second Avenue
Suite 730
Seattle, WA 98104
(206) 442-0900

1751 Old Pecos Trail
Suite O
Santa Fe, NM 87505
(505) 992-8860

2685 Ulmerton Road
Suite 102
Clearwater, FL 33762
(727) 572-5226

5850 T.G. Lee Boulevard
Suite 440
Orlando, FL 32822
(407) 851-1155

ESA | Environmental
Science
Associates

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INTRODUCTION

The Treatment Plant No. 2 Headworks Replacement Project Draft Subsequent Environmental Impact Report (SEIR) for the Orange County Sanitation District (District) was completed and released for public review on January 23, 2004 pursuant to California Environmental Quality Act (CEQA) requirements. The public review period lasted 45 days, officially closing on March 9, 2004. Eight comment letters were received on the Draft SEIR.

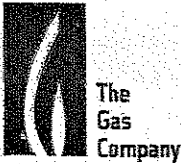
This document provides copies of comments received and responses to these comments. Copies of all the comment letters are followed by responses to each comment. The comments are referenced numerically by letter and comment number; the comment letters are numbered in sequential order. For example, the first comment in Letter A (Southern California Gas Company) is A-1. Table 1 lists agencies that submitted comments on the SEIR during the comment period.

The Final SEIR for the Treatment Plant No. 2 Headworks Replacement Project consists of this response to comments document and the Draft SEIR. The Mitigation Monitoring and Reporting Program (MMRP) for the Headworks Replacement Project is included with this response to comments document.


Table 1: List of Comments Received on the SEIR

ID NO.	COMMENTORS	RESPONSE PAGE NO.
AGENCIES/ORGANIZATIONS		
A.	Southern California Gas Company	13
B	Costa Mesa Sanitary District	13
C	City of Anaheim Planning Department	13
D	City of Fullerton, Development Services Department	13
E	Southern California Association of Governments	13
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COMMENT LETTERS



Southern California Gas Company
Technical Services Department
1919 S. State College Blvd., Bldg. A
Anaheim CA. 92806

A  Sempra Energy utility™

January 27, 2004

Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, Ca. 92708

Attn: Angie Anderson

Subject: (Job No. P2-66) Treatment Plant No. 2 Headworks Replacement Project

Thank you for providing the opportunity to respond to this E.I.R. (Environmental Impact Report) Document. We are pleased to inform you that Southern California Gas Company has facilities in the area where the aforementioned project is proposed. Gas service to the project can be provided from an existing gas main located in various locations. The service will be in accordance with the Company's policies and extension rules on file with the California Public Utilities Commission when the contractual arrangements are made.

This letter is not a contractual commitment to serve the proposed project but is only provided as an informational service. The availability of natural gas service is based upon conditions of gas supply and regulatory agencies. As a public utility, Southern California Gas Company is under the jurisdiction of the California Public Utilities Commission. Our ability to serve can also be affected by actions of federal regulatory agencies. Should these agencies take any action, which affect gas supply or the conditions under which service is available, gas service will be provided in accordance with the revised conditions.

This letter is also provided without considering any conditions or non-utility laws and regulations (such as environmental regulations), which could affect construction of a main and/or service line extension (i.e., if hazardous wastes were encountered in the process of installing the line). The regulations can only be determined around the time contractual arrangements are made and construction has begun.

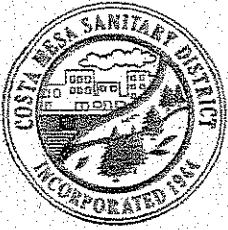
Estimates of gas usage for residential and non-residential projects are developed on an individual basis and are obtained from the Commercial-Industrial/Residential Market Services Staff by calling (800) 427-2000 (Commercial/Industrial Customers) (800) 427-2200 (Residential Customers). We have developed several programs, which are available upon request to provide assistance in selecting the most energy efficient appliances or systems for a particular project. If you desire further information on any of our energy conservation programs, please contact this office for assistance.

Sincerely,

Robert S. Warth
Technical Supervisor
West Region-Anaheim

s.s.
eir04.doc

A-1



Costa Mesa Sanitary District

2004 01 28 PM 1:05

File 2

ENGINEERING

Phone

(714) 754-5043

Fax

(714) 432-1436

January 28, 2004

Web Address

www.ci.costa-mesa.ca.us

Mr. Jim Herberg
c/o Angie Anderson
Orange County Sanitation District
10844 Ellis Ave.
Fountain Valley, CA 92708

Mailing Address

P. O. Box 1200
Costa Mesa, CA
92628-1200

RE: DRAFT SUBSEQUENT EIR
HEADWORKS REPLACEMENT AT PLANT NO. 2

Dear Jim:

The Costa Mesa Sanitary District has reviewed the Draft Subsequent EIR and remains in support of the project to replace the Headworks at Plant No. 2 as described in our previous letter to you dated May 22, 2003.

B-1

Street Address

77 Fair Drive
Costa Mesa, CA
92626-6520

Sincerely,

Robin B. Hamers
Manager/District Engineer

cc: Bd
Staff

Board of Directors

Arlene Schäfer
Greg Woodside
Art Perry
James Ferryman
Dan Worthington

City of Anaheim
PLANNING DEPARTMENT

RECEIVED

2004 FEB 10 AM 7:30

ENGINEERING

February 4, 2004

Mr. Jim Herberg, Engineering Manager
c/o Angie Anderson
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

**Re: Notice of Availability of the Draft Subsequent Environmental Impact Report
for Treatment Plant No. 2 Headworks Replacement Project**

Dear Mr. Herberg:

Thank you for the opportunity to review the above-referenced document. City staff has reviewed the document and has no comments at this time.

Please forward any subsequent public notices and/or environmental documents regarding this project to my attention at the address listed below.

If you have any questions regarding this response, please do not hesitate to contact me at (714) 765-5139, Extension 5739.

Sincerely,



Marie Newland, AICP
Assistant Planner

mnewland/res/agencies/OCSDNo2.doc

200 South Anaheim Boulevard
P.O. Box 3222
Anaheim, California 92803

TEL (714) 765-5139



DEVELOPMENT SERVICES DEPARTMENT

303 West Commonwealth Avenue, Fullerton, California 92832-1775

Telephone • (714) 738-6540
Fax • (714) 738-3110
Web site • www.ci.fullerton.ca.us

February 9, 2004

Angie Anderson
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

Subject: Review of Environmental Documents for Treatment Plant No. 2 Headworks Replacement Project

Dear Ms. Anderson:

The City of Fullerton has reviewed the Draft Subsequent Environmental Impact Report and related documentation for the above mentioned project submitted by your agency for our review and comment. The project appears to have no significant environmental impacts to the City of Fullerton, and no comments are being forwarded at this time.

Thank you for giving us the opportunity to review the documents and to comment on potential issues that may affect the City of Fullerton. If you should have questions regarding this response, please call me at (714) 738-6884.

Sincerely,

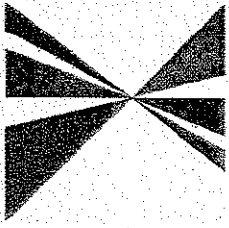
A handwritten signature in cursive script that reads "Heather Sowers".

Heather Sowers
Assistant Planner

Cc: Joel Rosen, AICP, Chief Planner

D-1

SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

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Orange County: Chris Norby, Orange County • Ronald Bates, Los Alamitos • Lou Bone, Tustin • Art Brown, Buena Park • Richard Chavez, Anaheim • Debbie Cook, Huntington Beach • Cathryn DeYoung, Laguna Niguel • Richard Dixon, Lake Forest • Alta Duke, La Palma • Bev Perry, Brea • Tod Ridgeway, Newport Beach

Riverside County: Marion Ashley, Riverside County • Ron Laveridge, Riverside • Jeff Miller, Corona • Greg Pettis, Cathedral City • Ron Roberts, Temecula • Charles White, Moreno Valley

San Bernardino County: Paul Biane, San Bernardino County • Bill Alexander, Rancho Cucamonga • Edward Burgnon, Town of Apple Valley • Lawrence Dale, Barstow • Lee Ann Garcia, Grand Terrace • Susan Longville, San Bernardino • Gary Chitt, Ontario • Deborah Robertson, Rialto

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneeme

Orange County Transportation Authority: Charles Smith, Orange County

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

February 9, 2004

Ms. Angie Anderson
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

RE: SCAG Clearinghouse No. I 20040037 Treatment Plant No. 2 Headworks Replacement Project

Dear Ms. Anderson:

Thank you for submitting the **Treatment Plant No. 2 Headworks Replacement Project** for review and comment. As area-wide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Treatment Plant No. 2 Headworks Replacement Project**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. It is not necessary to send/provide us a copy of the Final EIR for this Project. However, please provide us with a Notice of Availability for the Final EIR. Please be sure that the Notice includes a complete project description and comment due date. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

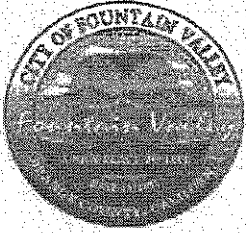
A description of the proposed Project was published in SCAG's **January 16-31, 2004 Intergovernmental Review Clearinghouse Report** for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

E-1



CITY OF FOUNTAIN VALLEY

10200 SLATER AVENUE • FOUNTAIN VALLEY, CA 92708-4736 • (714) 593-4400, FAX: (714) 593-4498

RECEIVED

COMMUNITY DEVELOPMENT

ENGINEERING

March 9, 2004

Mr. Jim Herberg
c/o Angie Anderson
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

VIA FAX: (714) 962-0356

SUBJECT: DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Dear Mr. Herberg:

Thank you for the opportunity to review and comment on the Draft Subsequent Environmental Impact Report prepared for Treatment Plant No. 2 – Headworks Replacement project.

The City of Fountain Valley Planning Department and Public Works Department have reviewed the document. The City of Fountain Valley is requesting that the District and its contractor(s) work with the City to establish acceptable trucking/hauling routes through the City. Also, that appropriate measures are developed and implemented to keep streets free of spilled materials.

F-1

Again, thank you for the opportunity to participate in the CEQA process. Please call me at (714) 593-4425 if you have any questions.

Sincerely,

Andrew Perea
Planning Director

c: City Engineer



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FEB 27 11 31 AM '04

IRVINE RANCH WATER DISTRICT

15600 Sand Canyon Ave., P.O. Box 57000, Irvine, CA 92619-7000 (949) 453-5300

February 20, 2004

Jim Herberg
C/O Angie Anderson
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

Subject: Draft Subsequent Environmental Impact Report (DSEIR) for Treatment Plant No. 2
Headworks Replacement Project (Job No. P2-66)

Dear Mr. Herberg:

Irvine Ranch Water District (IRWD) has received and reviewed the DSEIR for the subject project. As a significant discharging agency to OCSD, IRWD takes a keen interest in upgrades to the treatment plants and the subject project in particular. The project does not appear to affect operations or discharge by IRWD, however if construction does require changes in how IRWD conveys wastewater to OCSD, this potential should be discussed in the Supplemental EIR.

IRWD appreciates the opportunity to review and comment on this project, and looks forward to the issuance of the final environmental impact report. Should you have any questions or require additional information, please call Gregory Herr, Planning and Resources Specialist at (949) 453-5577.

G-1

Yours truly,

Richard A. Diamond
Principal Engineer – Water Resources

RAD/GKH



South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

RECEIVED

MAR 12 2004 5:16

ENGINEERING

FAXED: MARCH 12, 2004

March 12, 2004

Mr. Jim Herberg, Engineering Manager
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

Notice of Intent to Adopt Draft Subsequent Environmental Impact Report (Draft SEIR) for the Proposed 30-acre Treatment Plant No. 2 Headworks Replacement Project in Huntington Beach – Orange County Sanitation District

The South Coast Air Quality Management District (SCAQMD) 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 Subsequent Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Subsequent Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other 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,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

ORC040123-02
Control Number

Notice of Intent to Adopt Draft Subsequent Environmental Impact Report (Draft SEIR) for the Proposed 30-acre Treatment Plant No. 2 Headworks Replacement Project in Huntington Beach – Orange County Sanitation District

1. Based on the project description starting on page 2-1 of the Draft SEIR, the proposed project activities would require permit applications that would include SCAQMD Regulation III – New Source Review, Regulation XIV – New Source Review for Toxics, and possibly would require permitting actions from the SCAQMD for the following:
 - a. An application for alteration of the existing sewage treatment plant would be required to cover the proposed new headworks, and;
 - b. Either an alteration to the existing air pollution control system (apcs) or a new construction application (depending on whether the new apcs will be co-located with existing apcs or stand alone) will be required.

H-1

In addition, public notice requirements due to SCAQMD Rule 212 and/or Title V (This facility is a Title V source) may be required.

2. The SCAQMD recommends the following to reduce the possibility of odors from demolishing and dismantling the existing headworks and associated equipment, wherever feasible:
 - a. Rinse the surfaces of the old equipment with chemicals such as sodium hypochlorite, hydrogen peroxide or other oxidants, or;
 - b. Use odor suppressing foams used to minimize the release of odors.

H-2

3. Based on the proposed project's description of the excavation of soils previously under the sludge drying beds and soil movement associated with the project on page 2-5, the lead agency should include the influence of complying with SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil.

H-3

4. On page 3-15 of the Draft SEIR, the lead agency mentions mitigation measures that were identified in a previous document, the District's Strategic Plan Program EIR (PEIR) that was certified in October 1999. The lead agency also added measure M-3.2-1 in the Draft SEIR to further address PM10 emissions during soil hauling activities. To assist in the public review, it would be helpful if the previous measures proposed in the October 1999 PEIR were included in the Final SEIR. By adding the measures it would help the public and other interested parties see if any additional feasible measures were available to help reduce impacts from PM10 or other emission impacts.

H-4

Notice of Intent to Adopt Draft Subsequent Environmental Impact Report (Draft SEIR) for the Proposed 30-acre Treatment Plant No. 2 Headworks Replacement Project in Huntington Beach – Orange County Sanitation District

- 5. The discussion of the 2003 AQMP on page 3-9 should be modified to reflect the fact that the 2003 AQMP has been approved by the SCAQMD and CARB and is currently under review by EPA. H-5

- 6. Review of the emission worksheets in Appendix E indicates the following apparent omissions:
 - a. It is unclear if combustion emissions from the onsite dump trucks and water trucks were calculated. Staff was unable to locate these calculations. H-6
 - b. Haul truck emissions in the second table of the second page of Appendix E appear to be underestimated. It appears that haul truck emissions may have been calculated for an average haul truck trip length of 18 miles (one-way) instead of 36 miles (round trip). H-7
 - c. It is unclear if fugitive dust emissions from soil being transported to the landfill were calculated. Staff was unable to locate these calculations. H-8
 - d. The first table on the third page of Appendix E includes a mitigation efficiency of 50 percent, which is incorporated into the emission calculations. There is, however, no description of the measures or actions that will generate the 50 percent fugitive dust emission reduction. H-9
 - e. It is unclear if fugitive dust emissions from storage piles during the excavation phase were calculated. Staff was unable to locate these emission calculations. H-10
 - f. If emissions for any of the preceding emission sources were not calculated, it is recommended that they be calculated and included in the Final SEIR. H-11

- 7. For mitigation measures M-3.2-1 on page 3-15, it is recommended that the lead agency delete the following “, or maintain at least two feet of freeboard.” H-12

- 8. According to the discussion of truck trip emissions on page 3-15 and the haul truck emission tables in Appendix E, haul truck emissions are calculated based on a single round trip of 70 miles. The discussion on page 3-15 indicates that this could be two truck trips per day. As a result, peak daily haul truck emissions are underestimated. It is recommended that haul truck emissions be recalculated using two round trip truck trips (140 miles) per day in the Final SEIR. H-13

RESPONSES

COMMENT LETTER A: SOUTHERN CALIFORNIA GAS COMPANY, SEMPRA ENERGY UTILITY, JANUARY 27, 2004

Comment A-1

The comment offers and provides informational services for their energy conservation programs. The comment does not raise any significant environmental issues or otherwise pertain to the adequacy of the Draft SEIR. No further detailed response is necessary.

COMMENT LETTER B: COSTA MESA SANITARY DISTRICT, JANUARY 28, 2004

Comment B-1

The comment expresses support for the proposed project. The comment does not raise any significant environmental issues or otherwise pertain to the adequacy of the SEIR. No further detailed response is necessary.

COMMENT LETTER C: CITY OF ANAHEIM PLANNING DEPARTMENT, FEBRUARY 4, 2004

Comment C-1

No comments are offered at this time regarding the proposed project. The comment does not raise any significant environmental issues or otherwise pertain to the adequacy of the SEIR. No further detailed response is necessary.

COMMENT LETTER D: CITY OF FULLERTON, DEVELOPMENT SERVICES DEPARTMENT, FEBRUARY 9, 2004

Comment D-1

No comments are offered at this time regarding the proposed project. The comment does not raise any significant environmental issues or otherwise pertain to the adequacy of the SEIR. No further detailed response is necessary.

COMMENT LETTER E: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS, FEBRUARY 9, 2004

Comment E-1

No comments are offered at this time regarding the proposed project. The comment does not raise any significant environmental issues or otherwise pertain to the adequacy of the SEIR. No further detailed response is necessary.

COMMENT LETTER F: CITY OF FOUNTAIN VALLEY, MARCH 9, 2004**Comment F-1**

The comment requests that the District coordinate with the City of Fountain Valley regarding truck routes. The comment further requests that city streets be kept clean of construction debris. On page 3-56 of the SEIR, the SEIR recommends implementation of mitigation measure 6.2.1 of the 1999 PEIR to ensure minimum disruption of the local circulation network during short term construction activity. This measure requires preparation of a detailed construction schedule, notification to the City of Fountain Valley and minimization of truck traffic on nearby arterial highways. The District will coordinate with the City of Fountain Valley regarding truck traffic. To address potential spill over of dirt and other materials that will be hauled off site, the SEIR recommends implementation of mitigation measure M-3.2-1. This measure commits the District to requiring soil hauling contractors to cover trucks or provide a minimum of two feet of freeboard to prevent soil from spilling onto city streets.

COMMENT LETTER G: IRVINE RANCH WATER DISTRICT, FEBRUARY 20, 2004**Comment G-1**

The comment requests that the Irvine Ranch Water District be informed if construction activities would affect their operations. The project would not require that contributing sanitation districts modify operations during construction; a flow management plan has been modeled as part of the design of the Headworks Replacement Project. The output of this model is located in Appendix A of the SEIR.

COMMENT LETTER H: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, MARCH 12, 2004**Comment H-1**

The comment states that air emissions permits would be required for the alteration to the treatment plant and existing air pollution control system. The Draft SEIR notes on page 2-11 and page 3-15 that the District would need to obtain air emissions permits from the South Coast Air Quality Management District (SCAQMD) prior to construction of the project. The Draft SEIR notes that the power generation requirements would increase slightly. The Draft SEIR notes that a revision to the existing Title V permit would likely be required for power generation and new odor control equipment. The new equipment proposed by the project would improve emissions control technologies over existing conditions. The SEIR concludes that with permit revisions, the project's stationary air emissions sources would not result in a significant impact to air quality.

Comment H-2

The comment recommends additional measures to ensure that dismantled equipment does not emit nuisance odors. Such measures include rinsing the dismantled equipment with certain chemicals or using odor suppressing foams. These additional measures, however, are not necessary because the Draft SEIR already recommends a mitigation measure to reduce possible short term odor impacts to a less than significant level. On page 3-16, the Draft EIR discusses this potential impact and recommends mitigation measure M-3.2-2 that requires the immediate removal of

dismantled equipment from the site. Nonetheless and to address SCAQMD's comment, the Draft SEIR has been modified to include the following additional mitigation measure:

M-3.2-3 To ensure that the project would not emit offsite nuisance odors, the Contractor shall develop an odor mitigation plan (which can include draining and flushing equipment prior to demolition, application of hydrogen peroxide, etc) to be approved by District's Air Quality Division.

Comment H-3

The comment states that excavation of soils under the sludge drying beds and soil movement in general may trigger compliance with SCAQMD Rule 1166 concerning the emissions of volatile organic compounds (VOCs). Rule 1166 applies to soils that are contaminated with VOCs measured as greater than 50 parts per million (ppm) within three inches of the soil surface. To reduce health and safety impacts from encounters with soil contamination during excavation and soil movement, including excavation in the areas of sludge drying beds, the Draft SEIR identifies Mitigation Measure M-3.4.-1. This measure requires that soils be disposed of off site in accordance with applicable hazardous waste regulations. Consistent with this mitigation obligation, if the contamination exceeds the VOC levels of Rule 1166, the District must comply with its provisions. Mitigation Measure M-3.4-1 has been modified as follows to specifically identify compliance with Rule 1166 as one of the regulations that may be triggered:

M-3.4-1: Any contaminated soils encountered on the project site during tank removal, site clearance, or excavation shall be sampled to determine the nature and extent of the contamination and disposed of off site in accordance with applicable hazardous waste regulations, including SCAQMD Rule 1166 where soil samples reveal VOC levels in excess of 50 parts per million. The District will notify the Orange County Health Care Agency and other regulatory agencies as necessary prior to undertaking remedial action.

The District has conducted soil samples for four USTs located within the project area. The soil report indicated that the subsurface soils at the site have not been significantly impacted.¹ During excavation, if additional soil testing of the underground tanks or sludge drying beds indicate the probability of encountering VOC contaminated soils, the Contractor will prepare a written VOC Contaminated Soil Mitigation Plan in accordance with the SCAQMD Rule 1166 VOC Emission from Decontamination of Soil and submit the plan for SCAQMD approval.

¹ "Soil Sampling Report, OCSD Plant No. 2-22212 Brookhurst St, Huntington Beach, CA", Smith-Emery GeoServices (SEG) File No. 33604-1, SEG Report No. G-04-6068, dated March 10, 2004.

Comment H-4

The comment states that applicable mitigation measures from the 1999 PEIR should be included in the Draft SEIR to help the public and other interested parties to determine whether other feasible mitigation measures are available to reduce air quality impacts. While the mitigation measures from the 1999 PEIR are not restated in the text of the Draft SEIR, the Draft SEIR does include the Mitigation, Monitoring and Reporting Program that the Board adopted in conjunction with its certification of the 1999 PEIR as Appendix A. Therefore, this information has been included in the Draft SEIR for public review and scrutiny.

Comment H-5

The comment states that the 2003 AQMP has been approved by SCAQMD and the California Air Resources Board and is currently under review by the US EPA. The Draft SEIR acknowledges that the 2003 AQMP is under preparation. The current status is noted. Although, the status does not change the conclusions of the Draft SEIR, the Draft SEIR is revised as follows:

Currently, the SCAQMD and CARB have approved ~~is in the process of preparing~~ the Proposed 2003 Air Quality Management Plan for the South Coast Air Basin. The 2003 AQMP seeks to demonstrate attainment with state and federal air quality standards and will incorporate a revised emissions inventory, the latest modeling techniques, updated control measures remaining from the 1997/1999 SIP, and new control measures based on current technology assessments. The USEPA is currently reviewing the 2003 AQMP.

Comment H-6

The comment states that air emissions calculations may have omitted water truck and dump truck contributions. The calculations do not omit these mobile sources. Appendix E contains air emissions calculations worksheets. The calculations are divided between the operational phase and the construction phases including excavation, construction, and connection. The first Construction Input portion of the worksheet shows estimated daily miles for dump trucks and water trucks used during the construction phase. These daily vehicle miles traveled (VMT) estimates are added to the total VMT for light duty trucks (LDT) lower in the spreadsheet. Emissions from LDT are included in the overall emissions shown at the bottom of each worksheet as well as on Page 3-14 in Table 3.2-5 of the Draft SEIR.

Comment H-7

The comment states that air emissions calculations may have underestimated haul truck emissions by only calculating one-way trips. The calculations do not underestimate these mobile sources. Appendix E contains air emissions calculations worksheets. The calculations are divided between the operational phase and the construction phases including excavation, construction, and connection. The second table on the second page of the Appendix E summarizes emissions from haul truck trips during the excavation phase using total VMT for haul truck trips added on the previous page. The total haul truck VMT is derived by multiplying the construction inputs of 76 trips per day by 18 miles per trip by 2 ways per trip, resulting in the total 2,736 VMT.

Comment H-8

The comment states that fugitive dust from soil being transported to the landfill may not have been included in the air calculation estimates. The calculations include these mobile sources. Appendix E contains air emissions calculations worksheets. The calculations are divided between the operational phase and the construction phases including excavation, construction, and connection. The first table on the third page summarizes estimates of fugitive dust from haul trucks. These estimates are included in the total PM₁₀ estimates summarized on Page 3-14 of the Draft SEIR in Table 3.2-5. The Draft SEIR includes a mitigation measure requiring soil haul trucks to cover loads or maintain at least two feet of freeboard to further reduce fugitive PM₁₀ emissions.

Comment H-9

The comment states that the mitigation measures that provide the dust emissions reductions of 50% are not noted. The mitigation measure that provides this reduction is to “water active sites at least twice daily.” This measure and emissions reduction efficiency are included in Table 11-4 of the SCAQMD CEQA Air Quality Handbook. The emissions calculations assume that water trucks would apply water to construction sites as necessary to comply with SCAQMD Rule 403 as required by the mitigation measure 6.5-1c of the 1999 PEIR. This is assumed to be a minimum of twice per day.

Comment H-10

The comment states that air emissions calculations may have omitted fugitive dust emissions from soil piles. The calculations do not underestimate these fugitive dust sources. Appendix E contains air emissions calculations worksheets. The calculations are divided between the operational phase and the construction phases including excavation, construction, and connection. The first table on the third page summarizes fugitive dust emissions during excavation. The calculations include fugitive dust emissions for five different pieces of earth moving equipment operating eight hours per day. The emissions factors used are from the EPA’s *Compilation of Air Pollutant Emissions Factors, AP-42*, for aggregate batch drop which takes into account wind speed, moisture content, and silt content of soil. These estimates over-estimate actual emissions since undisturbed soil piles would be expected to emit less fugitive dust than soils actively being disturbed under similar wind conditions.

Comment H-11

The comment states that the air emissions calculations should reflect the comments noted above. The emissions calculations summarized on Page 3-14 Table 3.2-5 of the Draft SEIR include the emissions from sources mentioned in the previous comments. See responses H-6 through H-10.

Comment H-12

The comment recommends modifying mitigation measure M-3.2-1 to delete the option of allowing two feet of freeboard. Thus, the District would be required to cover all trucks hauling soils off site. As summarized on Table 3.2-5 of the Draft SEIR, project PM₁₀ emissions during the construction would be below the SCAQMD significance criteria. Based on this conclusion, no mitigation is required because the impact would be less than significant. Nonetheless, the Draft SEIR has identified mitigation measure M-3.2-1 as added precaution to further reduce PM₁₀ or

fugitive dust emissions. Since the measure is not required to mitigate the impact because the impact is considered less than significant, the Draft SEIR provides the District with flexibility to implement one of two options to further reduce fugitive dust emissions. Moreover, the mitigation measure included in the Draft SEIR is taken directly from the recommendation from the SCAQMD CEQA Air Quality Handbook in Table 11-4.

Comment H-13

The comment states that air emissions calculations may have underestimated operational haul truck emissions by only calculating one trip per day instead of two. Page 3-15 of the Draft SEIR notes that chemical deliveries may increase by approximately 416 trucks per year (1 to 2 trips per day). The comment suggests that 416 trips per year is greater than one trip per day and should be considered as two trips per day. The emissions calculations included on Page 3-16, in Table 3.2-6 of the Draft SEIR assume an increase of two trucks per day and are substantially below SCAQMD daily operational significance thresholds.

**ORANGE COUNTY SANITATION DISTRICT
MITIGATION MONITORING AND REPORTING PROGRAM
FOR THE TREATMENT PLANT NO. 2
HEADWORKS REPLACEMENT PROJECT**

AESTHETICS

Impact 3.1-1: Several of the new structures would be visible from adjacent residential neighborhoods and Pacific Coast Highway (PCH).

Measure (M-3.1-1) The contractor shall replace damaged landscaping and restore the construction area near the property boundary to a condition similar to existing conditions.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include in construction contract specifications	Monitor compliance with construction contract specifications. Record pre and post-construction conditions for administrative record	OCSD	Prior to and during construction activities

AIR QUALITY

Impact 3.2-1: Construction of the proposed project would emit criteria pollutants. Estimated daily average construction emissions would exceed significance thresholds set by the SCAQMD.

Measure (M-6.5-1a in the PEIR) General contractors shall maintain equipment engines in proper tune and operate construction equipment so as to minimize exhaust emissions. Such equipment shall not be operated during second stage smog alerts.

Measure (M-6.5-1b in the PEIR) During construction, trucks and vehicles in loading or unloading queues shall be kept with their engines off, when not in use, to reduce vehicle emissions. Construction activities shall be phased and scheduled to avoid emissions peaks, and discontinued during second-stage smog alerts.

Measure (M-6.5-1c in the PEIR) General contractors should use reasonable and typical watering techniques to reduce fugitive dust emissions. All unpaved demolition and construction areas shall be wetted as necessary during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403.

Measure (M-6.5-1d in the PEIR) Soil binders shall be spread on site, unpaved roads, and parking areas when needed.

Measure (M-6.5-1e in the PEIR) Ground Cover shall be re-established following completion of construction activities through seeding and watering if needed.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include air emissions restrictions and standard operating procedures for construction work in contract specifications.	Maintain record of construction oversight for administrative record	OCSD	Prior to and during construction
2. Include dust reduction measures listed in mitigation measures in contract specifications			
3. Conduct oversight of construction activities to ensure scope of work is carried out.			

Measure (M-3.2-1) Soil removal contractors shall cover all trucks hauling soil, sand, and other loose materials, or maintain at least two feet of freeboard.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include in construction contract specifications	Maintain record of site inspection (i.e. truck trips, coverage for administrative record)	OCSD	Prior to and during construction

Impact 3.2-3: The proposed project is not anticipated to result in objectionable odors affecting a substantial number of people.

Measure (M-3.2-2) The District shall ensure that contractors immediately remove salvaged/demolished equipment from Plant No. 2 to minimize potential odors during the removal of existing facilities. Staging areas shall not be used to store salvaged/demolished equipment.

Measure (M-3.2-3) To ensure that the project would not emit offsite nuisance odors, the Contractor shall develop an odor mitigation plan (which could include draining and flushing equipment prior to demolition, application of hydrogen peroxide, etc) to be approved by District’s Air Quality Division.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include in construction contract specifications	Monitor compliance with construction contract specifications	OCSD	During construction

GEOLOGY AND SOILS

Impact 3.3-1: The proposed project could expose people or structures to potential adverse effects due to rupture of a known earthquake fault, strong ground shaking, ground failure, including liquefaction and landslides due to seismic activity.

Measure (M-6.6-1b in the PEIR) Seismic Safety. The District will design and construct new facilities in accordance with District seismic standards and/or meet or exceed seismic, design standards in the most recent edition of the California Building Code.

Measure (M-6.6-2a in the PEIR) Spill Prevention. The District will implement the Spill Prevention Containment and Countermeasures Plan (SPCC).

Measure (M-6.6-2b in the PEIR) Spill Containment. OCSD chemical facilities will be designed with secondary containment, such as berms, to contain and divert toxic chemicals from wastewater flows and isolate damaged facilities to reduce contamination risks.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include design-level geotechnical evaluations in specifications prior to construction.	Maintain record of specifications for administrative record.	OCSD	Prior to construction activities.
2. Require compliance with California Building Code in contract specifications.	Maintain record of specifications for administrative record.	OCSD	Prior to construction activities.
3. Implement and update SPCC plan.	Maintain record of SPCC for administrative record.	OCSD	As needed.

Measure (M-3.1-1) The District shall implement the recommendations made in the geotechnical report prepared by Converse Consultants, which includes, but is not limited, to the following:

- For construction near fault splays, additional excavation and backfill with non-cohesive material on the base and sides of structures may be required.
- To accommodate potential ground movement caused by seismic event, pipes with flexible coupling should be considered.

- Removal and recompaction of the upper fill soils to minimize the potential for differential settlement to affect structures on grade.
- For critical structures, the use of mat foundation or reinforced perimeter footings with interior footings interconnected with grade beams for more rigidity to reduce the potential of seismically induced settlement or liquefaction.
- Structures with basements should be supported on mat foundations founded on native soils or compacted fill.
- Groundwater should be lowered by dewatering to at least five feet below the lowest excavation level. Existing structures should be protected during dewatering.
- Temporary construction slopes should be 1.5:1 or flatter for soils below groundwater level and 1:1 or flatter for soils above groundwater level. Surcharge loads should not be permitted within five feet or a distance equal to the depth of excavation, whichever is greater, unless the excavation is properly shored.
- Temporary shoring will be required where open cut excavations will not be feasible and space limitations would not allow for minimum excavation slopes or because of nearby structures.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include in construction contract specifications	Monitor compliance with construction contract specifications Maintain record of construction specifications, geotechnical evaluation, soil surveys and construction oversight for administrative record.	OCSD	Prior to approving final design and construction Prior to construction

HAZARDS AND HAZARDOUS MATERIALS

Impact 3.4-2: Contaminated soils could be encountered during underground storage tank removal or excavation for construction of the new structures.

Measure (M-3.4-1) Any contaminated soils encountered on the project site during tank removal, site clearance, or excavation shall be sampled to determine the nature and extent of the contamination and disposed of off-site in accordance with applicable hazardous waste regulations, including SCAQMD Rule 1166 where soil samples reveal VOC levels in excess of 50 parts per million. The District will notify the Orange County Health Care Agency and other regulatory agencies as necessary prior to undertaking remedial actions.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include in construction contract specifications	Contractor's SPCC Plan to be approved by the District's Safety Division	OCSD	Prior to installation
2. Notify Orange County Health Care Agency and other regulatory agencies as necessary	Obtain approval from OCHA and other agencies if necessary.	OCSD	Prior to and during tank removal.

Impact 3.4-3: Structures to be demolished may contain lead paint and/or asbestos containing materials

Measure (M-3.4-2) Structures to be demolished will be investigated for the presence of lead paint or asbestos containing material and proper precautions will be taken for safe removal and disposal of these materials prior to demolition activities.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include in construction contract specifications	Compliance with asbestos and lead paint removal plans. Monitor removals and maintain administrative record.	OCSD	Prior to demolition.

Impact 3.4-4: Construction activities could disturb abandoned oil and gas wells and pose a potential fire or explosion hazard.

Measure (M-3.4-3) The District shall comply with requirements of the Division of Oil, Gas, and Geothermal Resources Construction Site Plan Review process. The Division will be notified if any previously unknown wells are discovered during the construction process.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include in construction contract specifications	Monitor compliance with approved construction contract specifications.	OCSD	Prior to and during installation.

HYDROLOGY

Impact 3.5-1: The proposed project will temporarily modify the quality of effluent discharged to the ocean.

Measure (M-3.5-1) Prior to implementation of the connection phase of the new headworks, OCSD shall have in place the means of balancing influent between the two treatment plants to avoid exceeding effluent quality discharge limits.

Measure (M-3.5-2) OCSD shall include in its operating agreement with the Orange County Water District (OCWD) language stating that the SARI line may be diverted to Plant No. 1 during the 14-month headworks connection phase under a 2.0 or higher peaking factor during peak wet weather events. The agreement shall include procedures to be followed by OCSD and OCWD during peak wet weather events such that the GWRS will discontinue production of recycled water until the SARI line is removed from the source water of Reclamation Plant No. 1.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. OCSD Board of Directors and/or Joint Agency Committee approval	Obtain agreement with OCWD.	OCSD/OCWD	Prior to Construction Bid Approval.

Impact 3.5-2: The construction of the proposed project would result in erosion and receiving water quality impacts.

Measure (M-6.7-1a in the PEIR) Best Management Practices. The District will implement Best Management Practices (BMPs) as outlined in the SWMP.

Measure (M-6.7-1b in the PEIR) Storm Water Management. The District will train construction and operation employees in storm water pollution prevention practices. Individual contractors performing construction at each treatment facility shall be required to comply with provisions of the SWMP.

Measure (M-6.7-1c in the PEIR) Storm Drain Inspection. The District will inspect and maintain all on-site storm water drains and catch basins on plant property regularly.

Measure (M-6.7-1d in the PEIR) Regional Board. The District will apply the SARWQCB’s recommended BMPs during construction and operation as specified in the SWMP.

Measure (M-6.7-1e in the PEIR) Construction Site Storm Water. For construction involving disturbance greater than five acres of land, the District will incorporate into contract specifications the following requirements: The District will comply with the RWQCB requirements of the NPDES General

Permit for Discharges of Storm Water Associated with Construction Activity. The District will require that the contractor implement control measures that are consistent with the General Permit and with the recommendations and policies of the RWQCB. This would include submitting a Notice of Intent and site map to the RWQCB, developing a Storm Water Pollution Prevention Plan, and implementing site-specific best management practices to prevent sedimentation to surface waters.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Implement BMPs.	Maintain compliance with SWMP for administrative record. Maintain record of site inspections.	OCSD	As needed.
2. Implement SWMP.			
3. Periodically update SWMP.			
4. Periodically inspect construction sites.			

Measure (M-6.7-2a in the PEIR) Groundwater Dewatering. Construction contractors will comply with the District’s Dewatering Specifications.

Measure (M-6.7-2b in the PEIR) Dewatering Discharge. Water from dewatering operations will be disposed of in a suitable manner in conformance with the NPDES permit, as approved by RWQCB.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Update dewatering procedures periodically.	Maintain record of dewatering procedures for administrative record. Maintain record of site inspections.	OCSD	During construction.
2. Periodically inspect construction sites.			

NOISE

Impact 3.6-1: Operations of the proposed headworks facility would generate noise.

Measure (M-3.6-1) All buildings will be designed to insulate noise of the machinery such that fence-line noise standards would not be exceeded.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include in construction contract specifications.	Maintain record of construction oversight for administrative record.	OCSD	Prior to and during construction

Measure (M-6.4-2a in the PEIR) OCSD shall establish a performance noise standard for operational noise at Reclamation Plant No. 1 and Treatment Plant No. 2. The performance standard shall apply to the property line of each plant and shall prohibit hourly average noise levels in excess of 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. and 50 dBA between the hours of 10:00 p.m. and 7:00 a.m., as required by the Fountain Valley and Huntington Beach Noise Ordinances. Available mitigation to achieve the performance standard consists of locating noise sources away from sensitive receptors, installation of acoustical enclosures around noise sources, installation of critical application silencers and sequential mufflers for exhaust noise, installation of louvered vents, directing vent systems away from nearby residences, and constructing sound walls at the property lines.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
<ol style="list-style-type: none"> 1. Include compliance with local noise and construction ordinances in standard operational procedures 2. Implement noise reduction procedures when possible. 3. Consider operational noise when locating new equipment. 	<p>Maintain record of noise complaints for administrative record.</p>	<p>OCSD</p>	<p>On-going</p>

Impact 3.6-2: The proposed project would generate noise during construction.

Measure (M-3.6-2) During construction phases, the contractor shall ensure that all construction is performed in accordance with the City of Huntington Beach and Orange County noise standards.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
<ol style="list-style-type: none"> 1. Include in construction contract specifications 	<p>Maintain record of construction oversight for administrative record</p>	<p>OCSD</p>	<p>Prior to and during construction</p>

Measure (M-6.4-1a in the PEIR) The District’s standard specifications provide construction hours of work between 7:00 AM and 5:30 PM, except for emergency or special circumstances requiring that work be done during low-flow periods.

Measure (M-6.4-1b in the PEIR) All equipment used during construction shall be muffled and maintained in good operating condition. All internal combustion engine driven equipment shall be fitted with intake and exhaust mufflers that are in good condition.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include compliance with local noise and construction ordinances in construction specifications	Maintain record of construction oversight for administrative record	OCSD	Prior to and during construction
2. Include noise reduction procedures in construction specifications			
3. Provide construction oversight to ensure scope of work is carried out.			

Measure (M-6.4-1e in the PEIR) Nearby sensitive receptors affected by construction shall be notified concerning the project timing and construction schedule, and shall be provided with a phone number to call with questions or complaints.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Prepare and distribute notifications.	Maintain record of notification and distribution list.	OCSD	Prior to construction
2. Include noise reduction procedures in construction specifications			
3. Provide construction oversight to ensure scope of work is carried out.			

TRAFFIC

Impact 6.2-1: Periods of peak construction of the proposed project would add to traffic along local access streets.

Measure (M-6.2-1 in PEIR) For each major project or construction period, the District would complete a detailed construction schedule and notify the Cities of Fountain Valley and Huntington Beach of construction. Construction vehicles shall be run on a schedule to minimize truck traffic on arterial highways.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Require traffic control plan for construction projects.	Ensure that construction vehicle traffic complies with traffic control plan.	OCSD	Prior to and during construction
2. Notify affected cities of construction schedule.	Provide record of construction oversight.		
3. Provide construction oversight.			