Final

ORANGE COUNTY SANITATION DISTRICT BIOSOLIDS MASTER PLAN PROJECT NO. PS15-01

Final Program Environmental Impact Report
State Clearinghouse No. 2017071026

Prepared for
Orange County Sanitation District

May 2018

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OCSD Biosolids Master Plan
Final Environmental Impact Report

CHAPTER 1
Introduction to Response to Comments

This Final Program Environmental Impact Report (Final PEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and *CEQA Guidelines* (California Code of Regulations Section 15000 et seq.). The Final PEIR incorporates, by reference, the Draft PEIR (State Clearinghouse No. 2017071026) prepared by the Orange County Sanitation District (OCSD) for the Biosolids Master Plan (BMP), Project No. PS15-01 (proposed program), as it was originally published and the following chapters, which include revisions made to the Draft PEIR.

1.1 CEQA Requirements

Before OCSD may approve the program, it must certify that the Final PEIR: a) has been completed in compliance with CEQA; b) was presented to the OCSD Board of Directors who reviewed and considered it prior to approving the project; and c) reflects OCSD's independent judgment and analysis. (*CEQA Guidelines* Section 15090)

CEQA Guidelines Section 15132 specifies that the Final PEIR shall consist of the following:

- The Draft PEIR or a revision of that draft;
- Comments and recommendations received on the Draft PEIR;
- A list of persons, organizations, and public agencies commenting on the Draft PEIR;
- The response of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

This Final PEIR for the OCSD BMP presents Chapter 1 through Chapter 5:

- Chapter 1: Introduction and CEQA process
- Chapter 2: A list of persons, organizations, and public agencies commenting on the Draft PEIR, and the written comments received on the Draft PEIR
- Chapter 3: Written responses to each comment identified in Chapter 2
- Chapter 4: Revisions made to the Draft PEIR in response to comments received or initiated by the Lead Agency
- Chapter 5: Mitigation Monitoring and Reporting Program

1.2 CEQA Process

Public Participation Process

Notice of Preparation and Public Scoping

In accordance with Section 15082 of the *CEQA Guidelines*, a Notice of Preparation (NOP) of a PEIR was prepared and circulated for review by applicable local, state and federal agencies and the public. The 30-day project scoping period, which began with the distribution of the NOP, remained open through August 13, 2017. One public scoping meeting was held on July 31, 2017 at the OCSD Plant No. 2, Operations Center Training and Conference Room. The NOP provided the public and interested public agencies with the opportunity to review the proposed project and to provide comments or concerns on the scope and content of the environmental review document including: the range of actions; alternatives; mitigation measures, and significant effects to be analyzed in depth in the PEIR.

Notice of Availability of the Draft PEIR

The Notice of Availability (NOA) of the Draft PEIR was posted on February 14, 2018 with the County Clerk in Orange County. The Draft PEIR was circulated to federal, state, and local agencies and interested parties requesting a copy of the Draft PEIR. Copies of the Draft PEIR were made available to the public at the following locations:

- OCSD Website (https://www.ocsd.com/ceqa)
- OCSD, Administrative Office Building at Plant No. 1, Engineering Planning Division – 10844 Ellis Avenue, Fountain Valley, CA 92708
- OCSD, Plant No. 2, Operations Center – 22212 Brookhurst Street, Huntington Beach, CA 92646
- Huntington Beach Central Library – 7111 Talbert Avenue, Huntington Beach, CA 92648
- Huntington Beach Banning Library – 9281 Banning Avenue, Huntington Beach, CA 92646
- Fountain Valley Public Library – 17635 Los Alamos Street, Fountain Valley, CA 92708

The Draft PEIR was circulated for public review from February 14, 2018 through April 2, 2018. OCSD established a 45-day review period, as required by Section 21091 of the Public Resources Code. During this period, OCSD held one public meeting to provide interested persons with an opportunity to comment orally or in writing on the Draft PEIR and the project. The public meeting was held at the OCSD Plant No. 2, Operations Center Training and Conference Room in Huntington Beach on March 15, 2018.

1.3 Evaluation and Response to Comments

CEQA Guidelines Section 15088 requires OCSD, as the Lead Agency, to evaluate comments on environmental issues received from parties that have reviewed the Draft PEIR and to prepare a written response. The written responses to commenting public agencies shall be provided at least ten (10) days prior to the certification of the Final PEIR (*CEQA Guidelines* §15088(b)).

1.4 Final PEIR Certification and Approval

Prior to considering the project for approval, OCSD, as the Lead Agency, will review and consider the information presented in the Final PEIR and will certify that the Final PEIR:

(a) Has been completed in compliance with CEQA;

(b) Has been presented to the Board of Directors as the decision-making body for the Lead Agency, which reviewed and considered it prior to approving the project; and

(c) Reflects OCSD's independent judgment and analysis.

Once the Final PEIR is certified, OCSD's Board of Directors may proceed to consider program approval (*CEQA Guidelines* §15090). Prior to approving the proposed program, OCSD must make written findings and adopt statements of overriding considerations for each unmitigated significant environmental effect identified in the Final PEIR in accordance with Sections 15091 and 15093 of the *CEQA Guidelines*. Because the Final PEIR does not identify any unmitigated significant environmental effects, a statement of overriding considerations is not required.

1.5 Notice of Determination

Pursuant to Section 15094 of the *CEQA Guidelines*, OCSD will file a Notice of Determination (NOD) with the Office of Planning and Research and Orange County Clerk within five working days of program approval.

CHAPTER 2
Comment Letters

The Draft Program Environmental Impact Report (PEIR) for the Orange County Sanitation District (OCSD) Biosolids Master Plan (BMP), Project No. PS15-01 (proposed program) was circulated for public review for 45 days (February 14, 2018 through April 2, 2018) in accordance with the requirements of *CEQA Guidelines* Section 15105(a). The OCSD received eight comment letters during the public review period, which are listed in **Table 2-1** and included within this chapter. The letters have been marked with brackets that delineate comments pertaining to environmental issues and the information and analysis contained in the Draft PEIR. Responses to such comments are provided in Chapter 3.

A public meeting on the Draft PEIR was also held on March 15, 2018 at the OCSD Plant No. 2 Operations Center Training & Conference Room. An overview of the proposed program and a summary of the Draft PEIR findings were provided during the meeting. Verbal comments received during the meeting were related to clarifications of the activities proposed. Comment cards were made available at the meeting; however, no written comments were provided during the meeting.

TABLE 2-1
COMMENT LETTERS RECEIVED

Comment No.	Commenting Agency	Date of Comment
1	State Clearinghouse, Office of Planning and Research	April 2, 2018
2	California Department of Resources Recycling and Recovering (CalRecycle)	March 5, 2018
3	California Department of Fish and Wildlife (CDFW)	March 29, 2018
4	South Coast Air Quality Management District (SCAQMD)	March 30, 2018
5	Orange County Health Care Agency	March 23, 2018
6	Orange County Transportation Authority	March 28, 2018
7	Gae Brummett	March 13, 2018
8	Patrick Osullivan	March 14, 2018

CHAPTER 3
Responses to Comments

A summary of the comments contained within the comment letters received during the public review period for the Draft PEIR are included in this section (see Chapter 2). OCSD provides individual responses to the bracketed comments in each letter. In some instances, in response to the comment, OCSD has made additions or deletions to the text of the Draft PEIR; additions are included as underlined text and deletions as ~~stricken text~~. The revisions do not significantly alter the conclusions in the Draft PEIR.

Letter 1: State Clearinghouse, Office of Planning and Research

Comment 1-A

The comment acknowledges the State Clearinghouse distributed the EIR as required under CEQA to pertinent agencies. The CalRecycle comment letter is attached.

Response 1-A

The comment is noted and saved in the program record. No response is required because there are no specific comments on the contents in the Draft PEIR. The CalRecycle letter is responded to as Letter 2 below.

Letter 2: California Department of Resources Recycling and Recovering (CalRecycle)

Comment 2-A

The comment reiterates the program description provided in the Draft PEIR and introduces comments on the proposed program for OCSD's consideration.

Response 2-A

No response is required because there are no specific comments on the contents in the Draft PEIR.

Comment 2-B

The comment states that the County of Orange, Environmental Health Division, Local Enforcement Agency (LEA), and CalRecycle are responsible for providing regulatory oversight

of solid waste handling activities, such as transfer/processing operations/facilities and in-vessel digestion operations/facilities, including permitting and inspections. Further, the comment states that the LEA will make a determination as to whether the proposed program falls under the in-vessel digestion requirements as described in Title 14, California Code of Regulations, Chapter 3.2 (commencing with section 17896.1). The comment then provides a contact number to discuss any permitting requirements.

Response 2-B

The proposed program does not include solid waste handling activities. The food waste component of the proposed program includes pre-processed food waste that will be conveyed into the Food Waste Receiving Facility through a hose. OCSD will comply with any applicable permit requirements from the LEA and CalRecycle.

Comment 2-C

The comment thanks OCSD for the opportunity to review and comment on the Draft PEIR and requests copes of subsequent environmental documents and/or notices for the program. The comment further requests that CalRecycle be given notice 10 days' notice of program adoption.

Response 2-C

The comment is noted and saved in the program record. OCSD will provide a notice of the OCSD Board meeting to deliberate on the proposed program.

Letter 3: California Department of Fish and Wildlife (CDFW)

Comment 3-A

The comment acknowledges that the CDFW has received and reviewed the Draft PEIR and summarizes the program description of the proposed program. Additionally, the comment provides background information on various species that are located within the vicinity of the program area, such as the light-footed Ridgway's rail and Belding's savannah sparrow. Last, the comment begins to introduce various environmental concerns of the proposed program, but the concerns are provided in Comments 3-B through 3-E below.

Response 3-A

The comment is noted. No response is required because there are no specific comments on the contents in the Draft PEIR.

Comment 3-B

The comment states that the Draft PEIR does not specifically discuss impacts to the Light-Footed Ridgway's Rail beyond Table 3.3-2, even though they were identified in Brookhurst Marsh, which is located approximately 0.2 mile from the program area. Given recent restoration efforts,

the Huntington Beach Wetlands, including Talbert Marsh, has become more suitable habitat for this species. Similarly, the Draft PEIR does not mention Belding's Savannah Sparrow. The comment expresses concern regarding potential edge effects and indirect impacts to Talbert Marsh and the Santa Ana River, particularly noise-related impacts associated with proposed construction activities. CDFW is particularly concerned that elevated noise levels will impact the Belding's Savannah Sparrow and Light-Footed Ridgway's Rail. The comment requests further discussion and analysis of the impacts of noise generated by the program on birds and other wildlife in the Final PEIR and that the analysis should include a mitigation measure or measures that minimize impacts to, and takings of, CESA-listed endangered and fully protected species. The mitigation measures should designate the entire Huntington Beach Wetlands area as a sensitive noise receptor and include best management practices design features to ensure noise levels are maintained at or below ambient conditions.

Response 3-B

As stated by the commenter, Table 3.3-2 in the Draft PEIR identifies the potential for the presence of the Light-Footed Ridgeway's Rail (previously known as the Light-Footed Clapper Rail) within the Talbert Marsh as moderate. The Draft PEIR recognizes that nesting activities associated with this species as well as other species have a potential to be impacted by construction activities associated with the implementation of the proposed program. The potential effect is identified in Impact 3.3-1, which explains that construction noise could result in indirect impacts to birds nesting in the vicinity of the proposed project. The commenter recommends a specific noise level as the threshold of potential impact. The use of a specific noise level is not appropriate because the ambient noise levels at the location of the nesting birds need to be taken into account. Currently noise is primarily generated by motor vehicle traffic along Pacific Coast Highway and Brookhurst Street. Along Pacific Coast Highway, traffic noise extends into Talbert Marsh. Based on the average daily traffic volumes of 37,000 trips along Pacific Coast Highway, the noise levels are currently 73.5 dBA CNEL at 50 feet, 69.2 dBA CNEL at 200 feet and 66.5 dBA CNEL at 400 feet (see Attachment 1). Along Brookhurst Street, traffic noise extends into Talbert Marsh. Based on the average daily traffic volumes of 11,000 trips, the noise levels are currently 67.1 dBA CNEL at 50 feet, 62.9 dBA CNEL at 200 feet, and 60.2 dBA CNEL at 400 feet (see Attachment 1).

Mitigation Measure BIO-1 is included in the Draft PEIR to provide protection to nesting birds and to avoid any potential taking. The measure requires a qualified biologist to conduct a nesting survey if construction activities are scheduled during the nesting season (i.e., February 15 to August 31). If active nests are detected, a minimum buffer must be provided and a qualified biologist would then monitor any active nests within the buffer area. The biologist will have the authority to increase or decrease the buffer and/or make other recommendations to minimize impacts (e.g., to curtail, modify, or cease particular activities, such as pile driving, or to provide temporary noise attenuation) if nest activity appears to be adversely affected. The presence of a qualified biological monitor provides a more effective means to ensure that nesting birds are not adversely affected during construction activities compared to arbitrarily limiting construction noise levels without considering existing ambient noise levels and accounting for tolerance of locally nesting to ambient noise. If existing ambient noise levels in suitable nesting habitat are

greater than 60 dBA, exposure to additional construction noise that does not significantly increase ambient levels may not disturb this nesting activity. The presence of a qualified biological monitor provides the ability to determine if nesting birds are actually being disturbed, and is more practical than specifying an arbitrary noise threshold.

Comment 3-C

The comment states that indirect impacts to biological resources from stormwater runoff and/or hazardous materials were not analyzed in the draft PEIR. Due to the diverse number of species that use the Santa Ana River and Huntington Beach Wetlands for nesting and foraging, and the program's proximity to a California least tern/western snowy plover colony, the Department requests that the Final PEIR include an analysis and discussion of whether or not impacts to biological resources could result from potential storm water impacts. The comment recommends the following mitigation measure be included in the Final PEIR: "All surface runoff generated from program activities shall be captured on site and diverted away from Huntington Beach Wetlands".

Response 3-C

As discussed in Section 3.8 Hydrology and Water Quality on page 3.8-12, OCSD's standard practice is to capture runoff within each treatment plant site and deliver the runoff to the onsite wastewater treatment system for treatment. Therefore, stormwater runoff increases due to the implementation of the proposed program would not impact the adjacent Santa Ana River or Talbert Marsh.

Comment 3-D

The comment states that it is unclear if long-term indirect impacts to wildlife inhabiting surrounding open space could occur due to artificial lighting associated with program operation. The comment requests that the Final PEIR discuss and analyze lighting impacts on biological resources and require that all program-related temporary and permanent lighting adjacent to native habitat utilize the lowest illumination necessary for human safety and shield/direct the lighting away from Talbert Marsh and the Santa Ana River.

Response 3-D

Currently, the program site includes visual barriers separating the proposed facilities from Talbert Marsh and the Santa Ana River. These visual barriers include vegetation and/or walls. As discussed in the Final PEIR in Section 3.1, the program could introduce additional sources of lighting. The proposed lighting would be for operational and security purposes. The level of lighting would be similar to the operational and security lighting that currently exists at Plant No. 2. Mitigation measures are included to ensure that lighting does not affect adjacent areas such as the Talbert Marsh and the Santa Ana River. These measures include complying with the City of Huntington Beach's existing and future lighting ordinances as well as shielding and directing lighting downward to avoid light intrusion to the surrounding uses. The implementation of the mitigation measures would reduce potential indirect impacts to biological resources within Talbert Marsh and the Santa Ana River.

Comment 3-E

The comment states that the proposed program has the potential to increase the density of American crows in the program vicinity as a result of food waste from construction workers. The CDFW is concerned that program-related increases in crows during construction could impact nesting/foraging species in the marshes, particularly California Least Tern and Western Snowy Plover productivity at the nearby Huntington State Beach nest site. The comment states that there is a direct correlation between the density of crows and the availability of human-generated food and trash; therefore, the comment recommends that the Final PEIR include an analysis and discussion of the potential of the program to attract crows which could prey upon the nearby California Least Tern/Western Snowy Plover colony. The comment recommends the following mitigation measure be included in the Final PEIR: "On-site workers shall store food and trash such that it is inaccessible to crows. Food and trash shall be removed from the construction site on a daily basis. Waste management practices shall be monitored throughout construction activities."

Response 3-E

Construction activities associated with the proposed program would occur over approximately 20 years. Construction activities related to various programs within Plant No. 1 and Plant No. 2 have occurred for many years. OCSD's standard practice is to include construction specifications that include requirements for housekeeping, rubbish control and sanitation. To date, there have not been issues related to increases in American crows due to food and trash. Each construction program associated with the program would include similar requirements. They include keeping the worksite and other areas used in a neat and clean condition, and free from any accumulation of rubbish and debris. Contractors are required to dispose of all rubbish and waste materials of any nature generated on the work sites and to regularly collect and dispose of such materials and waste. The implementation of these standard practices would reduce potential increases of the American crow population in the program vicinity, and therefore, would not adversely impact nesting/foraging species in the marshes, particularly California Least Tern and Western Snowy Plover productivity at the nearby Huntington State Beach nest site.

Comment 3-F

The comment thanks OCSD for the opportunity to comment on the Draft PEIR and provides a CDFW contact and provides references to the background information on biological species within the program area in previous comments.

Response 3-F

The comment is noted for the record. No response is required because there are no specific comments on the contents in the Draft PEIR.

Letter 4: South Coast Air Quality Management District (SCAQMD)

Comment 4-A

The comment summarizes the program description of the proposed program components.

Response 4-A

No response is required because there are no specific comments on the contents in the Draft PEIR.

Comment 4-B

The comment summarizes the significance determinations of the proposed program in regards to air quality and emissions. The comment then states that the SCAQMD has comments on the air quality methodology of the Draft PEIR and provides reference to an attachment to the comment letter. The comment then requests that OCSD provide SCAQMD with written responses to all comments on the Final PEIR before program certification. The comment provides a staff contact number for questions or concerns.

Response 4-B

The comment is noted and saved in the program record. No response is required because there are no specific comments on the contents in the Draft PEIR.

Comment 4-C

The comment states that based on a review of Table 2-4 in the Draft PEIR, SCAQMD staff found that there is a reasonable possibility that construction activities of later-phase biosolids facilities could overlap with operation of earlier-phase facilities. In the event an overlapping construction and operation scenario is reasonably foreseeable, OCSD should analyze a scenario where construction activities overlap with operational activities, unless OCSD expressly prohibits overlapping construction and operational activities. The comment recommends that OCSD identify the overlapping years among the nine programs, combine construction emissions with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA operational thresholds of significance to determine the level of significance in the Final PEIR.

Response 4-C

In order to evaluate the overlap of construction and operational emissions, the following information will be added to Section 3.2.3 of the Draft PEIR under Impact 3.2-2 starting on 3.2-28.

> Construction and Operational Emissions Overlap
>
> Because the program will be implemented in phases, there is a reasonable possibility that construction activities of later phase biosolids facilities could overlap with operation of

earlier phase facilities. In order to determine the combined significance of these activities, the construction and operational activities are combined and compared to the SCAQMD's operational threshold.

Operational activities would begin with the construction of the Interim Food Waste Receiving Facility by 2020. This would increase daily truck activities by 8 daily trips. There would be no new flare operations, new natural gas usage, nor new area source emissions as the food waste receiving facility is strictly tanks and electric pumps. Total new trips at buildout in 2038 would be 34. Therefore, between 2020 and 2038, total operational emissions would represent approximately 24 % of the program's total mobile source emissions.

Additionally, maximum daily construction emissions used a default 2018 aggregate truck fleet to determine emissions from haul trucks. Because trucks used to haul debris from construction waste and deliver construction equipment would be contracted, the default fleet mix would change with each subsequent year. Therefore, emissions from the aggregate truck fleet in 2021 (for a new program within the master plan beginning in 2021) would differ from the emissions for the aggregate fleet mix for the max year 2018. Therefore, in order to accurately predict haul and vendor emissions future construction activities, the emissions for haul and vendor trucks have been adjusted accordingly. Calculation assumptions and calculations are included in Attachment 2. Table 3.2-7A shows the unmitigated combined construction and operational emissions. As shown, the proposed program would exceed the SCAQMD's daily regional significance threshold for NOx. Therefore, construction phase emissions for NOx would be significant without Mitigation Measure AQ-1.

TABLE 3.2-7A
PROPOSED PROGRAM UNMITIGATED CONSTRUCTION AND OPERATIONAL EMISSIONS

	Estimated Emissions (lbs/day)					
Emissions Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2021 Combined Emissions						
Operational Emissions	<1	3	1	<1	<1	<1
Construction Onsite & Worker	17	175	116	0.21	21	13
Construction Haul & Vendor	1	36	34	<1	1	<1
2038 Combined Emissions						
Operational Emissions	<1	11	5	<1	1	1
Construction Onsite & Worker	17	175	116	<1	21	13
Construction Haul & Vendor	1	16	33	<1	<1	<1
2021 Total Combined Emissions	18	**213**	151	<1	22	13
2038 Total Combined Emissions	18	**201**	154	<1	22	14
Regional Significance Threshold	55	55	550	150	150	55
Significant Impact?	No	**Yes**	No	No	No	No

SOURCE: ESA Modeling 2018 (based on Attachment 2)

The following information will be added to Section 3.2.3 of the Draft PEIR under Impact 3.2-2 starting on 3.2-29.

Construction and Operational Emissions Overlap

With the implementation of mitigation measure AQ-1, the proposed program's maximum daily construction and operational emissions would be reduced to below regulatory thresholds as shown in **Table 3.2-8A**.

TABLE 3.2-8A
PROPOSED PROGRAM MITIGATED CONSTRUCTION AND OPERATIONAL EMISSIONS

	Estimated Emissions (lbs/day)					
Emissions Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2021 Combined Emissions						
Operational Emissions	<1	3	1	<1	<1	<1
Construction Onsite & Worker	4	10	99	<1	13	6
Construction Haul & Vendor	1	36	34	<1	1	<1
2038 Combined Emissions						
Operational Emissions	<1	11	5	<1	1	1
Construction Onsite & Worker	4	10	99	<1	13	6
Construction Haul & Vendor	1	16	33	<1	<1	<1
2021 Total Combined Emissions	5	49	134	<1	14	6
2038 Total Combined Emissions	5	37	138	<1	15	7
Regional Significance Threshold	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No

SOURCE: ESA Modeling 2018 (based on Attachment 2)

Based on the reduction of the total NOx emissions with the implementation of Mitigation Measure AQ-1, impacts related to a violation of air quality standards from combined construction and operational activities associated with the proposed program would be less than significant.

Comment 4-D

The comment states that SCAQMD should be identified as a Responsibly Agency for the proposed program because the SCAQMD will provide permits. The comment provides the following permits and compliance requirements that the proposed program is subject to:

a) The proposed excavations at Plant No. 1 and No. 2 will require a SCAQMD Rule 1166 – VOC Contaminated Soil Excavation Plan, if VOC contaminated soil is expected to be encountered during the excavation activities, and/or may be subject to SCAQMD Rule 1466 if the soil contains other toxics.

b) The proposed demolition of structures will be subject to SCAMQD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities.

c) The proposed construction of the interim food waste facility with 250 wet tons per day capacity will require complete and timely applications for permit to construct and operate. Any grinders and separators that are not part of the processing system may also need their own permits.

d) The proposed construction of any odor control treatment systems at the interim food waste facility will require complete and timely applications for permits to construct and operate.

e) The proposed alteration/modification of the existing food waste facility at Plant No. 2 will require complete and timely applications for permits to construct and operate. Any grinders and separators that are not part of the processing system may also need their own permits.

f) The proposed construction or alteration of any odor control treatment systems at the modified Plant No. 2 will require complete and timely applications for permit to construct and operate.

The comment then provides a contact number for the SCAQMD Engineering and Permitting staff.

Response 4-D

As discussed in Section 3.2 Air Quality, the SCAQMD is primarily responsible for planning, implementing and enforcing air quality standards within the South Coast Air Basin. This includes the review and approval/denial of permits under their jurisdiction. According to CEQA Guidelines Section 15381, a "'Responsible agency' means a public agency, other than the lead agency, which has the responsibility for carrying out or approving a program. For the purposes of CEQA, the term 'responsible agency' includes all public agencies other than the lead agency which have discretionary approval power over the program." Because the SCAQMD has jurisdiction over several permits that may be required for the individual programs under the Master Plan, the SCAQMD should be considered a Responsible Agency with respect to the Program. SCAQMD will be identified as a Responsible Agency for the Program.

Comment 4-E

The comment states that the Final PEIR should discuss how OCSD will comply with applicable SCAQMD rules and regulations, including, but not limited to, the following:

a. Rule 201: Permit to Construct

b. Rule 203: Permit to Operate

c. Rule 212: Standards for Approving Permits and Issuing Public Notice

d. Rule 401: Visible Emissions

e. Rule 402: Nuisance

f. Rule 403: Fugitive Dust

g. Rule 1166: Volatile Organic Compound Emissions from Decontamination of Soil

h. Regulation 13: New Source Review

i. Rule 1401: New Source Review of Toxic Air Contaminants

j. Rule 1403: Asbestos Emissions from Demolition/Renovation Activities

k. Regulation 30: Title V Permits

The comment provides common odor management methods and discusses potential environmental issues with these methods. The comment states that if specific odor management methods that contribute to air quality are used then the Final PEIR should calculate the operational emissions, or demonstrate that the products used for proposed program construction and operations will have no adverse environmental impacts because the formulations will be free of toxic compounds, VOC, and fragrances.

Response 4-E

The program is required to comply with all applicable laws, regulations and administrative mandates, including rules adopted by the SCAQMD, as discussed in the Draft PEIR on page 3.2-13. The commenter identified additional rules, and they are discussed below. A description of how the program will comply with the rules cited in the comment is addressed below:

Discussion of **Rules 201, 203, and 212** are added to the Draft PEIR as follows. The Program will comply with these rules by submitting the appropriate applications for construction and operation of new emissions sources in a timely manner prior to the start of construction or operation activities. Permits to construct and operate were identified in the Draft PEIR on page 2-32. Activities covered under the permits will not begin until a permit has been approved by the SCAQMD.

Rule 401 is discussed in the Draft PEIR, and the Program will comply with this rule during construction by ensuring all equipment is properly maintained in accordance with the manufacturer's standards. During operation, the Program will comply with this rule through the implementation of filtration and scrubber units for odor and flaring operations to reduce or eliminate visible emissions in accordance with Rule 401.

Rule 402 is discussed in the Draft PEIR, and the Program will comply with this rule by containing sources of odors, and when necessary, providing appropriate odor treatment. Implementation of mitigation measure AQ-3, which ensures contractors promptly remove salvaged/demolished equipment from the treatment plant, will also reduce objectionable odors associated with the Program.

Rule 403 is discussed in the Draft PEIR, and the Program will comply with this rule by implementing fugitive dust controls and best management practices, such as the application of water and other applicable measures as listed in Rule 403.

Rule 1166 is added to the Draft PEIR as follows. As discussed in Section 3.7 Hazards and Hazardous Materials in the Draft PEIR, Plant No. 1 has one open LUST cleanup site. Construction activities associated with the proposed Collections Yard Relocation on Plant No. 1 could encounter contaminated soil during excavation. The Program will comply with this rule by evaluating the VOC content of all soils that will be excavated under the Program and preparing a VOC Contaminated Soil Mitigation Plan for any soils containing VOC concentrations greater than 50 ppm ("VOC Contaminated Soil"). The VOC Contaminated Soil Mitigation Plan will outline measures to minimize VOC emissions to the atmosphere during excavation and subsequent handling of VOC Contaminated Soil. OCSD shall submit the Contaminated Soil

Mitigation Plan for SCAQMD's approval before beginning excavation of any VOC Contaminated Soils. During excavation activities near the LUST site, the Program will also provide notification of excavation dates to the SCAQMD and monitor for VOC emissions as outlined in Rule 1166. The Program will comply with all applicable handling and removal requirements identified in Rule 1166 when excavating and handling VOC Contaminated Soils.

Rule 1401 is added to the Draft PEIR as described below. As stated in the Draft PEIR on page 3.2-34, the operation of the program includes the continued use of chemicals and the flaring of gases associated with the processing of biosolids. Additionally, the onsite CenGen facility could result in continued toxic air contaminant (TAC) emissions. The chemicals and processes associated with these operations already occur onsite and are permitted to the extent SCAQMD deems appropriate. Therefore, the implementation of the Program is not anticipated to introduce new sources of TACs. However, should the increase in facility throughput exceed the currently permitted levels, the Program will be required to apply for a new or updated permit to operate using the new parameters as outlined under Regulation II, *Lists and Criteria Identifying Information Required of Applicants Seeking a Permit to Construct from the South Coast Air Quality Management District*. Because the proposed program would not introduce new sources of TACs, the proposed program would not be required to comply directly with Rule 1401 – New Source Review of Toxic Air Contaminants.

Rule 1403 is added to the Draft PEIR as described below. As discussed in Section 3.7 Hazards and Hazardous Materials in the Draft PEIR, based on the age of the structures at Plant No. 2, there is a potential for asbestos to be located on site. The Program will comply with this rule by conducting an initial survey of the structures to be demolished in order to determine the presence or absence of asbestos following the guidelines outlined in Rule 1403. Should asbestos be found in the facilities to be demolished, the SCAQMD shall be notified as outlined in Rule 1403. Asbestos shall be removed from the facility to be demolished before demolition commences following the appropriate removal and handling procedures detailed in Rule 1403.

Regulation VIII governs the pre-construction review requirements for new, modified, or relocated facilities. The Program will comply with this regulation through air quality analysis provided in the Draft PEIR. If OCSD determines that there are new emissions or emissions that are in addition to those identified in the PEIR, then OCSD will provide subsequent air quality analysis for the individual programs associated with the proposed program. These additional analyses would occur prior to the initiation of the individual program construction.

Regulation XXX is the air pollution control permit system required to implement the federal Operating Permit Program as required by Title V of the federal Clean Air Act as amended in 1990. The proposed modifications and improvements to the OCSD facility that are part of the Biosolids Master Plan are not subject to Title V because the proposed operations of the facilities would not increase stationary emissions, and therefore, would not be required to comply with this regulation.

With respect to odor management methods, Section 3.2.3 of the PEIR, under Impact 3.2-5, page 3.2-38, states that "Source separated organics (SSO or food waste) odors can result from

volatilization of nitrogen and sulfur rich organic compounds that are common in many types of food wastes. Therefore, the proposed program was designed to implement odor control treatment technologies (carbon canisters) in order to treat foul air in the SSO tanks. The activated carbon may serve as a passive odor control system as the tanks are filled and drawn down." The passive odor control systems associated with the closed SSO system would not result in additional operational emissions.

In addition, the PEIR states: "Further, odor control systems are being implemented in the proposed [Digester Feed Facility (DFF)], which blends primary sludge with thickened waste activated sludge. These odor control facilities would be implemented within facility processes where necessary to reduce potential odor impacts." While the exact nature of the odor control systems for the DFF have not yet been identified, if the odor system requires additional permitting or results in additional operational emissions, OCSD will ensure these issues are addressed in subsequent environmental documentation prior to permit approval.

The following rules and regulations are hereby included in Section 3.2.2 Regulatory Framework under the SCAQMD's Rules and Regulations section starting on page 3.2-13.

Regulation II – Lists and Criteria Identifying Information Required of Applicants Seeking a Permit to Construct from the South Coast Air Quality Management District: This regulation identifies information required of applicants seeking permits to construct air pollution sources and requires submission of such information before an application can be determined to be complete.

Rule 201 – Permit to Construct: This rule states that a person shall not build, erect, install, alter or replace any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce or control the issuance of air contaminants without first obtaining written authorization for such construction from the Executive Officer. A permit to construct shall remain in effect until the permit to operate the equipment or agricultural permit unit for which the application was filed is granted or denied, or the application is canceled.

Rule 203 – Permit to Operate: This rule states that:

A) A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202.

B) The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Rule 212 – Standards for Approving Permits: This rule identifies the standards that will be used by the SCAQMD to approve or deny a permit to construct or operate.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the proposed program:

Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil: This rule sets requirements to control the emission of Volatile Organic Compounds (VOC) from excavating, grading, handling and treating VOC contaminated soil as a

result of leakage from storage or transfer operations, accidental spillage, or other deposition.

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other non-criteria pollutants. The following is a list of rules which may apply to the proposed program:

Rule 1401 – New Source Review of Toxic Air Contaminants: This rule specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants listed in Table I. The rule establishes allowable risks for permit units requiring new permits pursuant to Rules 201 or 203.

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities: The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

Regulation XIII – New Source Review: This regulation sets forth pre-construction review requirements for new, modified, or relocated facilities, to ensure that the operation of such facilities does not interfere with progress in attainment of the national ambient air quality standards, and that future economic growth within the South Coast Air Quality Management District (District) is not unnecessarily restricted. The specific air quality goal of this regulation is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors.

In addition to nonattainment air contaminants, this regulation will also limit emission increases of ammonia, and Ozone Depleting Compounds (ODCs) from new, modified or relocated facilities by requiring the use of Best Available Control Technology (BACT).

Letter 5: Orange County Health Care Agency

Comment 5-A

The comment explains that the Orange County Solid Waste Local Enforcement Agency (LEA) is responsible for enforcing State solid waste regulations.

Response 5-A

The comment is noted and saved in the program record. No response is required because there are no specific comments on the contents in the Draft PEIR.

Comment 5-B

The comment states that the OCSD plant operations appear to fall within the "Excluded Activities" of the California Solid Waste Regulations and quotes various definitions as described

in the California Code of Regulations, Title 14, Section 17896.6, Excluded Activities. The comment then advises OCSD that Excluded Activities do not preclude the LEA from inspecting plant operations. The comment requests that updates on the proposed program be provided in the future and provides a contact number for questions.

Response 5-B

The proposed Interim and Ultimate Food Waste Receiving Facility will receive pre-processed food waste as a slurry. The slurry is proposed to be delivered by truck in leak-proof containers. The slurry would be pumped through a hose that is connected directly to the side of the holding tanks. From the holding tanks, the food waste is fed into the digesters.

The commenter states that solid waste would be received at the facilities. The commenter is technically correct. The food waste slurry is classified as a solid waste. However, the proposed processing of the food waste at Plant No. 2 would be exempt from CalRecycle's regulations. In accordance with California Code of Regulation, Title 14, Sections 17403.1 (a)(8) and 17896.6 (a)(1), a Publicly Owned Treatment Works (POTW) like OCSD is exempt from CalRecycle's transfer/storage/processing permits when it receives vehicle-transported solid waste material for the purpose of anaerobic co-digestion with POTW Treatment Plant wastewater. OCSD will work closely with OCHCA (LEA) and CalRecycle during the planning, construction, and operation of the proposed food waste processing facilities at Plant No. 2. In addition, OCSD will be required to work with Environmental Protection Agency (EPA) Region 9 and the Regional Board (Region 8) to incorporate language in its draft National Pollutant Discharge Elimination System (NPDES)/Waste Discharge Requirements (WDR) permit regarding the proposed project.

OCSD understands that the LEA could inspect the operations of the proposed facilities in the future. As more detailed design is provided, OCSD will evaluate if the PEIR adequately addresses the potential effects of each program. If subsequent CEQA documentation is prepared, OCSD will provide the LEA updates related to the proposed food waste facilities.

Letter 6: Orange County Transportation Authority

Comment 6-A

The comment requests that the program name for "I-405, New I-405 South Entrance" be changed to "I-405 Improvement Program", and that the program description be changed to read "Improvements to I-405 and Euclid/Ellis interchange" (page 3-3, Table 3-2).

Response 6-A

To accurately reference the I-405 project, the eighth item in Table 3-2 on page 3-3 of the Draft PEIR is revised as follows:

I-405, ~~New~~ I-405 Improvement Program ~~South Entrance~~	Plant No. 1	Wastewater Treatment Facilities	~~Public Right-of-way improvements to I-405 south entrance along Ellis Avenue~~ Improvements to I-405 and Euclid/Ellis interchange

Comment 6-B

The comment requests that "Orange County Transportation Agency" be revised to "Orange County Transportation Authority" (page 3.11-1).

Response 6-B

To accurately reference the Orange County Transportation Authority, the first sentence of the last paragraph on page 3.11-1 of the Draft PEIR is revised as follows:

> **Beach Boulevard (SR 39)** is an eight lane north-south principal arterial designated as a "Smart Street corridor" by the Orange County Transportation ~~Agency~~ Authority.

Comment 6-C

The comment requests that Hamilton Avenue/Victoria Street is defined as a four-lane primary arterial in Huntington Beach and a four-lane secondary arterial extending east to SR-55 in the City of Costa Mesa (page 3.11-3).

Response 6-C

This comment requests that the correct roadway classification is provided for the Hamilton Avenue/Victoria Street segment. The fifth paragraph on page 3.11-3 of the Draft PEIR is revised as follows:

> **Hamilton Avenue/Victoria Street** is a four-lane primary ~~major~~ arterial in Huntington Beach and a four-lane secondary ~~primary~~ arterial extending east ~~west~~ to SR-55 in the City of Costa Mesa.

Comment 6-D

The comment states that there is currently no bike path along the Santa Ana River adjacent to Plant No. 1, but rather a "well utilized soft-surface county-designated Riding and Hiking Trail". A paved bike path is provided on the east bank of the Santa Ana River and adjacent to Plant No. 1, and is on the west bank of the Santa Ana River adjacent to Plant No. 2. Additionally, an all-weather paved shared-use path connecting the Santa Ana River Trail and Brookhurst exists along the southern edge of Plant No. 2.

Response 6-D

This comment provides a correction to the reference to the Santa Ana River Bike Path. The last sentence on page 3.11-4 is revised as follows:

> The Santa Ana River Bike Path is located on the east side of the Santa Ana River adjacent to Plant No. 1 and the west and east sides of the Santa Ana River adjacent to ~~Plant No. 1 and~~ Plant No. 2.

Comment 6-E

The comment requests that "Congestion Management Plan" be revised to "Congestion Management Program" (page 3.11-5).

Response 6-E

This comment requests that the PEIR correctly reference the Congestion Management Program. The third sentence in the second paragraph on page 3.11-5 is revised as follows:

> The purpose of the state-mandated Congestion Management Program ~~Plan~~ (CMP) is to monitor roadway congestion and assess the overall performance of the region's transportation system.

Comment 6-F

The comment explains that "Bicycle lanes" refer to one type of bikeway classification and does not encompass all bicycle facilities such as off-street Class I bikeways described on page 3.11-4. The comment recommends modifying the terminology to illustrate impacts will not affect "bicycle facilities" instead of the more specific "bicycle lanes" (page 3.11-14).

Response 6-F

To correct the reference to bicycle lanes to bicycle facilities, the first, second and third paragraphs on page 3.11-14 of the Draft PEIR are revised as follows:

> **Construction**
>
> Construction trucks and employee vehicles associated with the proposed program would interact with public transportation vehicles as well as bicyclists on the roadway system in the program vicinity, but would not alter the physical configuration of the existing bus routes or stops or bicycle facilities ~~lanes~~. While construction vehicles will utilize existing roadways, these program vehicles would not impact the use of public transportation or bicycle facilities ~~lanes~~; and therefore, no impact on existing adopted policies, plans or programs or a reduction of safety in using public transportation or bicycle facilities ~~lanes~~ would occur during construction activities.
>
> **Operation**
>
> Operational trips associated with food waste trucks would interact with public transportation vehicles as well as bicyclists on the roadway system in the program vicinity, but would not

alter the physical configuration of the existing bus routes or stops or bicycle facilities ~~lanes~~. While the food waste trucks during operational activities will utilize existing roadways, these program vehicles would not impact the use of public transportation or bicycle facilities ~~lanes~~; and therefore, no impact on existing adopted policies, plans or programs or a reduction of safety in using public transportation or bicycle facilities ~~lanes~~ would occur.

As future growth in the program vicinity occur, development programs as well as roadway and pipeline improvements could impact public transportation bus stops and bicycle facilities ~~lanes~~ during construction activities. These potential cumulative impacts would be significant. Because the proposed construction and operational activities would not impact the use of public transportation or bicycle facilities ~~lanes~~ and would have no impact on existing adopted policies, plans or programs or a reduction of safety in using public transportation or bicycle facilities ~~lanes~~, the program would not contribute to potential cumulative impacts on public transportation or bicycle facilities ~~lanes.~~

Comment 6-G

The comment recommends that the Final PEIR include language disclosing if construction activities will require any short-term or long-term closures.

Response 6-G

The proposed construction and operational activities associated with the proposed program would include vehicles traveling along roadways to access Plant No. 1 or Plant No. 2. These vehicles, similar to other vehicles utilizing the public street system, have the potential to interact with existing public transit, bicycle and pedestrian facilities. Because all construction activities would occur within the treatment plant sites, no short-term or long-term closures along any existing street or trails/paths would occur.

Comment 6-H

The comment states that if the program has any impacts to nearby bus stops, OCSD must coordinate with OCTA to employ measures to reduce potential transit service disruptions. The comment also recommends that OCSD keep OCTA informed of any potential bus stop interruptions or street closures that may require detours. The comment then provides a contact number.

Response 6-H

The proposed program would not result in construction or operational activities that would disrupt bus stops or disrupt transit service in the program area.

Letter 7: Gae Brummett

Comment 7-A

The comment requests that Gae Brummett be included in OCSD's mailing list to stay informed of how to control local programs within Huntington Beach.

Response 7-A

The comment is noted and saved in the program record. No response is required because there are no specific comments on the contents in the Draft PEIR.

Letter 8: Patrick Osullivan

Comment 8-A

The comment states that the Southeast neighborhood of Huntington Beach is being adversely impacted by truck traffic, dust, noise and other adverse conditions due to the cumulative effect of multiple programs in the area: Poseidon, AES, Ascon, and Shopoff. The comment states the "the unneeded Poseidon should be eliminated from the cumulative programs list before any Statement of Overriding Considerations is certified".

Response 8-A

The impacts identified in the Biosolids Master Plan Draft PEIR will be reduced to less than significant after the implementation of the proposed mitigation measures. There are no impacts that would remain significant and therefore, no Statement of Overriding Considerations will be required with the proposed Biosolids Master Plan. The cumulative analysis provided in the Draft PEIR includes references to the Poseidon Desalination Plant as a known program that is currently in the planning process, but not approved. This Draft PEIR appropriately includes the Poseidon Desalination Plant as a cumulative program. Section 3 of the Draft PEIR includes an evaluation of effects associated with the implementation of cumulative programs and also includes a discussion of the program's contribution toward the cumulative impacts.

CHAPTER 4
Corrections and Additions to the Draft PEIR

This chapter contains a compilation of revisions made to the text of the Draft PEIR by OCSD as the Lead Agency, in response to the comments received during the 45-day public review period as well as minor edits. All revisions are previously introduced in Chapter 3 of this Final PEIR but are summarized here for convenience of the reader. Where the responses indicate additions or deletions to the text of the Draft PEIR, additions are indicated in underline and deletions in ~~strikeout.~~

3.0 Environmental Setting, Impacts and Mitigation Measures

Page 3-3

To accurately reference the I-405 project, the eighth item in Table 3-2 on page 3-3 of the Draft PEIR is revised as follows:

I-405, ~~New~~ I-405 Improvement Project ~~South Entrance~~	Plant No. 1	Wastewater Treatment Facilities	~~Public Right-of-way improvements to I-405 south entrance along Ellis Avenue~~ Improvements to I-405 and Euclid/Ellis interchange

3.2 Air Quality

Page 3.2-13

The following additions to rules and regulations is hereby included in Section 3.2.2 Regulatory Framework under the SCAQMD's Rules and Regulations section starting on page 3.2-13.

Regulation II – Lists and Criteria Identifying Information Required of Applicants Seeking a Permit to Construct from the South Coast Air Quality Management District: This regulation identifies information required of applicants seeking permits to construct air pollution sources and requires submission of such information before an application can be determined to be complete.

Rule 201 – Permit to Construct: This rule states that a person shall not build, erect, install, alter or replace any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce or control the issuance of air contaminants without first obtaining written authorization for such construction from the Executive Officer. A permit to construct shall remain in effect

until the permit to operate the equipment or agricultural permit unit for which the application was filed is granted or denied, or the application is canceled.

Rule 203 – Permit to Operate: This rule states that:

A) A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202.

B) The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Rule 212 – Standards for Approving Permits: This rule identifies the standards that will be used by the SCAQMD to approve or deny a permit to construct or operate.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the proposed program:

Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil: This rule This rule sets requirements to control the emission of Volatile Organic Compounds (VOC) from excavating, grading, handling and treating VOC contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other non-criteria pollutants. The following is a list of rules which may apply to the proposed program:

Rule 1401 – New Source Review of Toxic Air Contaminants: This rule specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants listed in Table I. The rule establishes allowable risks for permit units requiring new permits pursuant to Rules 201 or 203.

Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities: The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

Regulation XIII – New Source Review: This regulation sets forth pre-construction review requirements for new, modified, or relocated facilities, to ensure that the operation of such facilities does not interfere with progress in attainment of the national ambient air quality standards, and that future economic growth within the South Coast Air Quality Management District (District) is not unnecessarily restricted. The specific air quality goal of this regulation is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors.

In addition to nonattainment air contaminants, this regulation will also limit emission increases of ammonia, and Ozone Depleting Compounds (ODCs) from new, modified or relocated facilities by requiring the use of Best Available Control Technology (BACT).

Page 3.2-28

In order to evaluate the overlap of construction and operational emissions, the following information will be added to Section 3.2.3 of the Draft PEIR under Impact 3.2-2 starting on page 3.2-28.

Construction and Operational Emissions Overlap

Because the program will be implemented in phases, there is a reasonable possibility that construction activities of later phase biosolids facilities could overlap with operation of earlier phase facilities. In order to determine the combined significance of these activities, the construction and operational activities are combined and compared to the SCAQMD's operational threshold.

Operational activities would begin with the construction of the Interim Food Waste Receiving Facility by 2020. This would increase daily truck activities by 8 daily trips. There would be no new flare operations, new natural gas usage, nor new area source emissions as the food waste receiving facility is strictly tanks and electric pumps. Total new trips at buildout in 2038 would be 34. Therefore, between 2020 and 2038, total operational emissions would represent approximately 24 % of the total program mobile sources.

Additionally, maximum daily construction emissions used a default 2018 aggregate truck fleet to determine emissions from haul trucks. Because trucks used to haul debris from construction waste and deliver construction equipment would be contracted, the default fleet mix would change with each subsequent year. Therefore, emissions from the aggregate truck fleet in 2021 (for a new program within the master plan beginning in 2021) would differ from the emissions for the aggregate fleet mix for the max year 2018. Therefore, in order to accurately predict haul and vendor emissions future construction activities, the emissions for haul and vendor trucks have been adjusted accordingly. Calculations assumptions and calculations are included in Attachment 2. Table 3.2-7A shows the unmitigated combined construction and operational emissions. As shown, the proposed program would exceed the SCAQMD's daily regional significance threshold for NOx. Therefore, construction phase emissions for NOx would be significant without mitigation.

TABLE 3.2-7A
PROPOSED PROGRAM UNMITIGATED CONSTRUCTION AND OPERATIONAL EMISSIONS

	Estimated Emissions (lbs/day)					
Emissions Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2021 Combined Emissions						
Operational Emissions	<1	3	1	<1	<1	<1
Construction Onsite & Worker	17	175	116	0.21	21	13
Construction Haul & Vendor	1	36	34	<1	1	<1

2038 Combined Emissions						
Operational Emissions	<1	11	5	<1	1	1
Construction Onsite & Worker	17	175	116	<1	21	13
Construction Haul & Vendor	1	16	33	<1	<1	<1
2021 Total Combined Emissions	18	**213**	151	<1	22	13
2038 Total Combined Emissions	18	**201**	154	<1	22	14
Regional Significance Threshold	55	55	550	150	150	55
Significant Impact?	No	**Yes**	No	No	No	No

SOURCE: ESA Modeling 2018 (based on Attachment 2)

The following information will be added to Section 3.2.3 of the Draft PEIR under Impact 3.2-2 starting on 3.2-29.

Construction and Operational Emissions Overlap

With the implementation of mitigation measure AQ-1, the proposed program's maximum daily construction emissions would be reduced to below regulatory thresholds as shown in **Table 3.2-8A**.

TABLE 3.2-8A
PROPOSED PROGRAM MITIGATED CONSTRUCTION AND OPERATIONAL EMISSIONS

	Estimated Emissions (lbs/day)					
Emissions Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2021 Combined Emissions						
Operational Emissions	<1	3	1	<1	<1	<1
Construction Onsite & Worker	4	10	99	<1	13	6
Construction Haul & Vendor	1	36	34	<1	1	<1
2038 Combined Emissions						
Operational Emissions	<1	11	5	<1	1	1
Construction Onsite & Worker	4	10	99	<1	13	6
Construction Haul & Vendor	1	16	33	<1	<1	<1
2021 Total Combined Emissions	5	49	134	<1	14	6
2038 Total Combined Emissions	5	37	138	<1	15	7
Regional Significance Threshold	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No

SOURCE: ESA Modeling 2018 (based on Attachment 2)

Based on the reduction of the total NOx emissions with the implementation of Mitigation Measure AQ-1, impacts related to a violation of air quality standards from combined construction and operational activities associated with the proposed program would be less than significant.

Page 3.2-38

The Odor Control Master Plan (OCMP) includes technologies to reduce odor from activities within Plant No. 1 and Plant No. 2; however, the OCSD Board of Directors has not adopted the OCMP. Therefore, the second and third paragraphs on page 3.2-38 of the Draft PEIR are revised to read as follows:

> As described above, OCSD has prepared an OCMP for both Plant No.1 and Plant No. 2. New facilities including carbon canisters associated with the Interim and Ultimate Food Waste Facilities and DFF were designed and will be implemented to reduce odors. ~~constructed in compliance with the OCMP. Further, the proposed program's new and updated facilities will be implemented into future updates to the OCMP.~~
>
> Therefore, with the implementation of the upgraded odor control system and~~,~~ new odor control systems associated with the proposed program~~, and compliance with the updated OCSD OCMP~~, potential odor impacts to sensitive receptors would be less than significant.

3.11 Traffic and Transportation

Page 3.11-1

To accurately reference the Orange County Transportation Authority, the first sentence of the last paragraph on page 3.11-1 of the Draft PEIR is revised as follows:

> **Beach Boulevard (SR 39)** is an eight lane north-south principal arterial designated as a "Smart Street corridor" by the Orange County Transportation ~~Agency~~ Authority.

Page 3.11-3

This comment requests that the correct roadway classification is provided for the Hamilton Avenue/Victoria Street segment. The fifth paragraph on page 3.11-3 of the Draft PEIR is revised as follows:

Hamilton Avenue/Victoria Street is a four-lane primary ~~major~~ arterial in Huntington Beach and a four-lane secondary ~~primary~~ arterial extending east ~~west~~ to SR-55 in the City of Costa Mesa.

Page 3.11-4

This comment provides a correction to the reference to the Santa Ana River Bike Path. The last sentence on page 3.11-4 is revised as follows:

> The Santa Ana River Bike Path is located on the east side of the Santa Ana River adjacent to Plant No. 1 and the west and east sides of the Santa Ana River adjacent to ~~Plant No. 1 and~~ Plant No. 2.

Page 3.11-5

This comment request to correctly refer to the Congestion Management Program. The third sentence in the second paragraph on page 3.11-5 is revised as follows:

> The purpose of the state-mandated Congestion Management Program ~~Plan~~ (CMP) is to monitor roadway congestion and assess the overall performance of the region's transportation system.

Page 3.11-14

To correct the reference to bicycle lanes to bicycle facilities, the first, second and third paragraphs on page 3.11-14 of the Draft PEIR are revised as follows:

Construction

Construction trucks and employee vehicles associated with the proposed program would interact with public transportation vehicles as well as bicyclists on the roadway system in the program vicinity, but would not alter the physical configuration of the existing bus routes or stops or bicycle facilities ~~lanes~~. While construction vehicles will utilize existing roadways, these program vehicles would not impact the use of public transportation or bicycle facilities ~~lanes~~; and therefore, no impact on existing adopted policies, plans or programs or a reduction of safety in using public transportation or bicycle facilities ~~lanes~~ would occur during construction activities.

Operation

Operational trips associated with food waste trucks would interact with public transportation vehicles as well as bicyclists on the roadway system in the program vicinity, but would not alter the physical configuration of the existing bus routes or stops or bicycle facilities ~~lanes~~. While the food waste trucks during operational activities will utilize existing roadways, these program vehicles would not impact the use of public transportation or bicycle facilities ~~lanes~~; and therefore, no impact on existing adopted policies, plans or programs or a reduction of safety in using public transportation or bicycle facilities ~~lanes~~ would occur.

As future growth in the program vicinity occur, development projects as well as roadway and pipeline improvements could impact public transportation bus stops and bicycle facilities ~~lanes~~ during construction activities. These potential cumulative impacts would be significant. Because the proposed construction and operational activities would not impact the use of public transportation or bicycle facilities ~~lanes~~ and would have no impact on existing adopted policies, plans or programs or a reduction of safety in using public transportation or bicycle facilities ~~lanes~~, the program would not contribute to potential cumulative impacts on public transportation or bicycle facilities ~~lanes.~~

CHAPTER 5
Mitigation Monitoring and Reporting Program

CEQA Requirements

Section 15091(d) and Section 15097 of the CEQA Guidelines require a public agency to adopt a program for monitoring or reporting on the changes it has required in the project or conditions of approval to substantially lessen significant environmental effects. This Mitigation, Monitoring and Reporting Program (MMRP) summarizes the mitigation commitments identified in the OCSD Biosolids Master Plan (proposed program; BMP) Program EIR (State Clearinghouse No. 2017071026). Mitigation measures are presented in the same order as they occur in the Final PEIR.

The columns in the MMRP table provide the following information:

- **Mitigation Measure(s):** The action(s) that will be taken to reduce the impact to a less-than-significant level.
- **Implementation, Monitoring, and Reporting Action:** The appropriate steps to implement and document compliance with the mitigation measures.
- **Responsibility:** The agency or private entity responsible for ensuring implementation of the mitigation measure. However, until the mitigation measures are completed, OCSD, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the MMRP (CEQA Guidelines, Section 15097(a)).
- **Monitoring Schedule:** The general schedule for conducting each task, either prior to construction, during construction and/or after construction.

TABLE 5-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE OCSD BMP PROGRAM EIR

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
Aesthetics			
AES-1: All new permanent exterior lighting associated with proposed program components shall be shielded and directed downward to avoid any light intrusion to surrounding uses.	• Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file.	OCSD; Construction Contractor	Before, During, and After Construction
AES-2: Development of the proposed program and associated facilities shall comply with existing and future lighting ordinances for the cities of Fountain Valley and Huntington Beach.	• Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file. • Perform periodic site inspections to ensure ongoing compliance with future lighting ordinances. Retain inspections records in the project file.	OCSD; Construction Contractor	Before, During and After Construction
Air Quality and Greenhouse Gas Emissions			
AQ-1: Mobile off-road construction equipment (wheeled or tracked) used during construction of the individual projects of the proposed program shall meet the USEPA Tier 4 final standards, either as original equipment or equipment retrofitted to meet the Tier 4 final standards. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment.	• Include mitigation measure in construction contractor specifications. • Retain copies of contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file.	OCSD; Construction Contractor	Before and During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
AQ-2: When grading activities associated with the nine projects of the proposed program occur within 50 meters of the nearest sensitive receptors, the number of scrapers active onsite is restricted to a maximum of 5 and the number of dozers is restricted to a maximum of 2.	• Include mitigation measure in construction contractor specifications. • Retain copies of contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file.	OCSD; Construction Contractor	Before and During Construction
AQ-3: OCSD shall ensure that contractors promptly remove salvaged/demolished equipment associated with the proposed program from the treatment plants to minimize potential odors during the removal of existing facilities. Staging areas shall not be used to store salvaged/demolished equipment.	• Include mitigation measure in construction contractor specifications. • Retain copies of contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file.	OCSD; Construction Contractor	Before and During Construction
Biological Resources			
BIO-1: If removal of onsite trees and vegetation associated with the proposed program occurs during the non-nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors), no nesting survey or biological monitor are required. If the removal of onsite trees and vegetation associated with the proposed program occurs during the nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors), a qualified biologist shall conduct a survey prior to vegetation removal activities to determine if there are active nests within the onsite trees and vegetation proposed for removal. If an active nest is not found, no biological monitor is required. If active nests are detected, a minimum buffer (e.g., 300 feet for songbirds or 500 feet for raptors) around the nest shall be delineated and flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines the nesting species have fledged and is no longer active or the nest has failed. The buffer may be modified (i.e., increased or decreased) and/or other recommendations proposed (e.g., a temporary soundwall) as determined appropriate by the qualified biologist to minimize impacts. The qualified biologist shall monitor the removal of onsite trees and vegetation. Nest buffer distance will be based on species, specific location of the nest, the intensity of construction activities, existing disturbances unrelated to the proposed program present in the program area, and other factors. If grading/excavation or pile driving activities associated with the proposed program are scheduled outside the nesting season, no nesting survey or biological monitor are required. If grading/excavation or pile driving activities associated with the proposed program are scheduled during the nesting season, a qualified biologist shall conduct a survey, prior to grading/excavation or pile driving activities, of suitable nesting habitat within 500 feet of construction activities for the presence of nesting birds. If no active nests are detected, no biological monitor is required. If an active nest is detected, a minimum buffer (e.g., 300 feet for songbirds or 500 feet for raptors) around the nest shall be delineated and	• Include mitigation measure in construction contractor specifications. • Retain copies of the survey(s) in the project file. • Prepare reports to document any nesting bird species prior to construction activities. • Perform additional survey(s) if there is a lapse of construction activities for seven days or more. • Prepare reports to document any nesting bird species prior to resuming construction activities. • Retain surveys and reports in the project file.	OCSD; Construction Contractor	Before and During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
the active nest shall be flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines the nesting species have fledged and is no longer active or the nest has failed. The qualified biologist shall monitor the activities of the active nests within the buffer area. The buffer may be modified (i.e., increased or decreased) and/or other recommendations proposed (e.g., a temporary soundwall) as determined appropriate by the qualified biologist to minimize impacts. Nest buffer distance will be based on species, specific location of the nest, the intensity of construction activities, existing disturbances unrelated to the proposed program present in the program area, and other factors. If there is a lapse of construction activities associated with the proposed program during the nesting season for seven days or more, an additional nesting bird survey shall be conducted to determine if a nest is present prior to construction activities resuming. The procedure identified above for no active nest and an active nest shall be followed.			
Cultural Resources			
CUL-1: Prior to start of grading or excavation activities associated with the proposed program and within Plant No. 1 and Plant No. 2, OCSD shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior 2008) to carry out all mitigation related to archaeological resources.	• Include mitigation measure in construction contractor specifications. • Retain documentation of retaining a qualified archaeologist in the project file.	OCSD; Construction Contractor	Before and During Construction
CUL-2: Prior to start of grading or excavation activities associated with the proposed program and within Plant No. 1 and 2, the qualified archaeologist (or an archaeologist working under the direct supervision of the qualified archaeologist) shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains, and safety precautions to be taken when working with archaeological monitors. OCSD shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	• Include mitigation measure in construction contractor specifications. • Retain documentation demonstrating attendance of construction personnel to cultural resources sensitivity training.	OCSD; Construction Contractor	Before and During Construction
CUL-3: Archaeological and Native American monitoring shall be conducted for grading or excavation activities associated with the proposed program at Plant No. 1 and Plant No. 2. Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the program area, and under the direct supervision of the qualified archaeologist. The frequency of monitoring shall take into account the rate of excavation and grading activities, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation. The frequency of the monitoring shall be determined by the qualified archaeologist in consultation with the Native American monitor and in coordination with OCSD. The Native American monitor shall be selected from a tribe that is culturally and traditionally affiliated with the program area as indicated by the NAHC. In the event that archaeological resources are unearthed during ground-disturbing activities, the archaeological monitor and/or Native American monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the discovery until OCSD, a qualified archaeologist, and a Native American monitor have evaluated the discovery and determined appropriate treatment (as prescribed in CUL-4).	• Include mitigation measure in construction contractor specifications. • Perform site inspections to ensure compliance with cultural sensitivity requirements. • Retain all archeological and tribal inspection forms in the project file. • Retain copy of final archaeological report in the project file.	OCSD; Construction Contractor	Before and During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a report that details the results of monitoring for submittal to OCSD, the South Central Coastal Information Center, and any Native American tribe that requests a copy.			
CUL-4: In the event of the unanticipated discovery of archaeological materials during grading or excavation activities associated with the proposed program, OCSD shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has conferred with OCSD on the significance of the resource. In the event that preservation in place is determined to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with OCSD that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. OCSD shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource are considered.	• Include mitigation measure in construction contractor specifications. • Perform site inspections to ensure compliance with cultural sensitivity requirements. • Retain inspection forms in the project file. • Retain correspondence between archeologist and Native American representative. • Retain a copy of Archeological Resources Treatment Plan (if one is required) in the project file.	OCSD; Construction Contractor	Before and During Construction
CUL-5: Prior to start of excavation activities associated with the proposed program that exceed 10 feet in depth in previously undisturbed sediments, OCSD shall retain a qualified paleontologist meeting the Society for Vertebrate Paleontology (SVP) Standards (SVP 2010) to carry out all mitigation related to paleontological resources. The qualified paleontologist shall be selected from the list of County of Orange certified paleontologists.	• Include mitigation measure in construction contractor specifications. • Retain documentation of retaining a qualified paleontologist in the project file.	OCSD; Construction Contractor	Before and During Construction
CUL-6: Prior to start of excavation activities associated with the proposed program that exceed 10 feet in depth in previously undisturbed sediments, the qualified paleontologist, or his or her designee, shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. OCSD shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	• Include mitigation measure in construction contractor specifications. • Retain documentation demonstrating attendance of construction personnel to fossil discovery training.	OCSD; Construction Contractor	Before and During Construction
CUL-7: Paleontological resources monitoring shall be performed during excavation activities associated with the proposed program that exceed 10 feet in depth in previously undisturbed sediments by a qualified paleontological monitor (or cross-trained paleontological/archaeological monitor) meeting the standards of the SVP 2010 under the direction of the qualified paleontologist. The monitor shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens. The qualified paleontologist, based on observations of subsurface soil stratigraphy and/or other factors, may increase, reduce, or discontinue monitoring in coordination with OCSD, as warranted. If construction or other project personnel discover any potential fossils during construction, regardless of the depth of work, all work shall cease at that location (within 100 feet) until the qualified paleontologist has assessed the discovery and made	• Include mitigation measure in construction contractor specifications. • Retain copies of all paleontological research and survey in the project file. • Perform site monitoring to ensure compliance with paleontological requirements. • Retain inspection forms in the project file.	OCSD; Construction Contractor	Before and During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
recommendations as to the appropriate treatment and re-assessed the depth at which monitoring shall be required.			
CUL-8: In the event of a fossil discovery by the paleontological monitor or construction personnel associated with the proposed program, all work in the immediate vicinity of the find shall cease. The qualified paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil(s) is (are) scientifically significant, the qualified paleontologist shall recover significant fossils following standard field procedures for collecting and curating paleontological resources, as described by the SVP (2010).	• Include mitigation measure in construction contractor specifications. • Paleontological monitoring reports and logs will be retained in project file. • Retain fossil recovery logs in the project file.	OCSD; Construction Contractor	Before and During Construction
CUL-9: If human remains are encountered during construction activities associated with the proposed program, OCSD or its contractor shall halt work in the vicinity (within 100 feet) of the find and contact the Orange County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC will be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98. The NAHC will designate a Most Likely Descendant (MLD) for the remains per PRC Section 5097.98. Until the landowner has conferred with the MLD, OCSD shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.	• Include mitigation measure in construction contractor specifications. • Retain inspection forms in the project file. • Retain NAHC correspondence in project files, if necessary.	OCSD; Construction Contractor	Before and During Construction
Hazards and Hazardous Materials			
HAZ-1: Prior to the initiation of any construction requiring ground-disturbing activities associated with the proposed program, OCSD shall complete an environmental assessment of the proposed site to locate the potential for soil and groundwater contamination in the program area. The recommendations set forth in the site assessment shall be implemented to the satisfaction of applicable agencies before and during construction.	• Include mitigation measure in construction contractor specifications. • Retain copies of all environmental site assessments in the project file.	OCSD; Construction Contractor	Before Construction
HAZ-2: If the site assessments determine that the site has contaminated soil and/or groundwater, a Soil and Groundwater Management Plan shall be prepared that specifies the method for handling and disposing of contaminated soil and groundwater prior to demolition, excavation, and construction activities. OCSD shall be responsible for ensuring implementation of the Plan in compliance with applicable regulations.	• Include mitigation measure in construction contractor specifications. • Retain copies of Soil and Groundwater Management Plan in the project file. • Perform site inspections to verify contractor compliance with hazardous materials. • Retain inspection forms in the project file.	OCSD; Construction Contractor	Before and During Construction

Attachment 1
Roadway Traffic Noise Levels

ESA

Roadway Traffic Noise Calculations

Existing										
	Speed	Traffic Volumes			Leq			CNEL		
Roadway/Segment	MPH	AM	PM	ADT	ROW	50 Feet	200 Feet	ROW	50 Feet	200 Feet
Brookhurst Street	50			11000	69.5	65.9	61.6	70.7	67.1	62.9
PCH	55			37000	75.8	72.2	68.0	77.0	73.5	69.2
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-

Future No Project										
	Speed	Traffic Volumes			Leq			CNEL		
Roadway/Segment	MPH	AM	PM	ADT	ROW	50 Feet	200 Feet	ROW	50 Feet	200 Feet
Brookhurst Street	50			0	-	-	-	-	-	-
PCH	55			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-

Future With Project										
	Speed	Traffic Volumes			Leq			CNEL		
Roadway/Segment	MPH	AM	PM	ADT	ROW	50 Feet	200 Feet	ROW	50 Feet	200 Feet
Brookhurst Street	50			0	-	-	-	-	-	-
PCH	55			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-

CNEL

Summary	50 ft. from ROW		200 ft. from ROW	
	Project	Cumulative	Project	Cumulative
Roadway/Segment	Increment	Increment	Increment	Increment
Brookhurst Street	-	-	-	-
PCH	-	-	-	-
0	-	-	-	-
0	-	-	-	-
0	-	-	-	-

% of ADT				
Vehicle Type	Day	Eve	Night	Sub total
Auto	77.6%	9.7%	9.7%	97.0%
Medium Truck	1.6%	0.2%	0.2%	2.0%
Heavy Truck	0.8%	0.1%	0.1%	1.0%
	80.0%	10.0%	10.0%	100.0%

Dist 1 **50**
Dist 2 **200**

Predicted Exisiting Noise Levels Table

	CNEL		
Roadway/Segment	ROW	50 Feet	200 Feet
Brookhurst Street	70.7	67.1	62.9
PCH	77.0	73.5	69.2
0	-	-	-
0	-	-	-
0	-	-	-

Roadway Traffic Noise Calculations

Predicted Future Noise Levels Table

Roadway/Segment		Existing	Future No Project	Future With Project	Project Increment	Cumulative Increment
Brookhurst Street		67.1	-	-	-	-
PCH		73.5	-	-	-	-
	0	-	-	-	-	-
	0	-	-	-	-	-
	0	-	-	-	-	-

Roadway Traffic Noise Calculations

Existing										
	Speed	Traffic Volumes			Leq			CNEL		
Roadway/Segment	MPH	AM	PM	ADT	ROW	50 Feet	400 Feet	ROW	50 Feet	400 Feet
Brookhurst Street	50			11000	69.5	65.9	59.0	70.7	67.1	60.2
PCH	55			37000	75.8	72.2	65.3	77.0	73.5	66.5
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-

Future No Project										
	Speed	Traffic Volumes			Leq			CNEL		
Roadway/Segment	MPH	AM	PM	ADT	ROW	50 Feet	400 Feet	ROW	50 Feet	400 Feet
Brookhurst Street	50			0	-	-	-	-	-	-
PCH	55			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-

Future With Project										
	Speed	Traffic Volumes			Leq			CNEL		
Roadway/Segment	MPH	AM	PM	ADT	ROW	50 Feet	400 Feet	ROW	50 Feet	400 Feet
Brookhurst Street	50			0	-	-	-	-	-	-
PCH	55			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-
0	0			0	-	-	-	-	-	-

CNEL

Summary	50 ft. from ROW		400 ft. from ROW	
	Project	Cumulative	Project	Cumulative
Roadway/Segment	Increment	Increment	Increment	Increment
Brookhurst Street	-	-	-	-
PCH	-	-	-	-
0	-	-	-	-
0	-	-	-	-
0	-	-	-	-

% of ADT				
Vehicle Type	Day	Eve	Night	Sub total
Auto	77.6%	9.7%	9.7%	97.0%
Medium Truck	1.6%	0.2%	0.2%	2.0%
Heavy Truck	0.8%	0.1%	0.1%	1.0%
	80.0%	10.0%	10.0%	100.0%

Dist 1 **50**
Dist 2 **400**

Predicted Exisiting Noise Levels Table

	CNEL		
Roadway/Segment	ROW	50 Feet	400 Feet
Brookhurst Street	70.7	67.1	60.2
PCH	77.0	73.5	66.5
0	-	-	-
0	-	-	-
0	-	-	-

Roadway Traffic Noise Calculations

Predicted Future Noise Levels Table

Roadway/Segment		Existing	Future No Project	Future With Project	Project Increment	Cumulative Increment
Brookhurst Street		67.1	-	-	-	-
PCH		73.5	-	-	-	-
	0	-	-	-	-	-
	0	-	-	-	-	-
	0	-	-	-	-	-

Attachment 2
Air Quality Information

ESA

Attachment 2

1 Construction and Operational Emissions Overlap
2 EMFAC Output
3 CalEEMod Runs (See Appendix B of the Draft PEIR)

OCSD - Biosolids Master Plan EIR
Construction and Operational Overlap Emissions Summary

CalEEMod 2016.3.1
Title: OCSD - Operational Buildout 10/4/2017

Operational activities would begin with the construction of the Interim Food Waste Receiving Facility by 2020. This would increase daily truck activities by 8 daily trips. There would be no new flare operations, new natural gas usage, or new area source emissions as the food waste receiving facility is strictly tanks and electric pumps. Total new trips at buildout in 2038 would be 34. Therefore Between 2020 and 2038, total operational emissions would represent approximately 24 % of the total project mobile sources.

Additionally, maximum daily construction emissions used a default 2018 aggregate truck fleet to determine emissions from haul trucks. Because trucks used to haul debris from construction waste and deliver construction equipment would be contracted, the default fleet mix would change with each subsequent year. Therefore, emissions from the aggregate truck fleet in 2021 (for a new project within the master plan beginning in 2021) would differ from the emissions for the aggregate fleet mix for the max year 2018. Therefore, in order to accurately predict haul and vendor emissions from these trucks during future construction years, the emissions for haul and vendor trucks are adjusted accordingly. These adjustments include:

	ROG	NOx	CO	SO_2	PM10	PM2.5
2018 Fleet Emissions Rate	0.17	4.58	0.76	0.01	0.05	0.05
2021 Fleet Emission Rate	0.11	3.16	0.62	0.01	0.01	0.01
% Reduction	35.81%	30.98%	18.06%	3.37%	73.15%	73.15%
2038 Fleet Emission Rate	0.07	1.38	0.61	0.01	0.00	0.00
% Reduction	59.99%	69.96%	20.39%	10.78%	90.98%	90.98%

*Emissions Rates taken from EMFAC 2014

	ROG	NOx	CO	SO_2	PM10	PM2.5
Unmitigated Operational Emissions						
Interim Emissions (2021)	0.07	2.59	1.31	0.01	0.29	0.24
Interim Emissions (2038)	0.31	10.80	5.44	0.04	1.22	0.99
Unmitigated Construction Emissions						
2018 Onsite + Worker	17	175	116	0.21	21	13
2018 Haul & Vendor	2	52	42	0.13	3	1
2021 Haul & Vendor	1	36	34	0	1	0
2038 Haul & Vendor	1	16	33	0	0	0
2021 Total	18	211	150	0	22	13
2038 Total	18	190	149	0	21	13
Unmitigated Construction/Operational Overlap						
2021	18	213	151	0	22	13
2038	18	201	154	0	22	14
Threshold	55	55	550	150	150	55
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**

OCSD - Biosolids Master Plan EIR
Construction and Operational Overlap Emissions Summary

	ROG	NOx	CO	SO_2	PM10	PM2.5
Unmitigated Operational Emissions						
Interim Emissions (2021)	0.07	2.59	1.31	0.01	0.29	0.24
Interim Emissions (2038)	0.31	10.80	5.44	0.04	1.22	0.99
Mitigated Construction Emissions						
2018 Onsite + Worker	4	10	99	0.21	13	6
2018 Haul & Vendor	2	52	42	0.13	3	1
2021 Haul & Vendor	1	36	34	0	1	0
2038 Haul & Vendor	1	16	33	0	0	0
2021 Total	5	46	133	0	14	6
2038 Total	5	26	132	0	13	6
Mitigated Construction/Operational Overlap						
2021	5	49	134	<1	14	6
2038	5	37	138	<1	15	7
Threshold	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

OCSD - Biosolids Master Plan EIR

EMFAC 2014 Values

EMFAC2014 (v1.0.7) Emission Rates
Region Type: County
Region: Los Angeles
Calendar Year: 2038
Season: Annual
Vehicle Classification: EMFAC2007 Categories
Units: miles/day for VMT, trips/day for Trips, g/mile for RUNEX, PMBW and PMTW, g/trip for STREX, HTSK and RUNLS, g/vehicle/day for IDLEX, RESTL and DIURN

Region	CalYr	VehClass	MdlYr	Speed	Fuel	Population	VMT	Trips	ROG_RUNE	CO_RUNEX	NOx_RUNE	PM10_RUN	PM2_5_RU	SOx_RUNEX
Los Angele	2038	HHDT	Aggregatec	Aggregatec	DSL	63801.4	10006155	0	0.087956	0.82796	1.733531	0.005514	0.005275	0.013749
Los Angele	2038	MHDT	Aggregatec	Aggregatec	DSL	107556.6	5293561	0	0.035243	0.185413	0.701476	0.002938	0.002811	0.010615
						% HHDT	0.654009		5.752412	54.14937	113.3745	0.360599	0.344999	0.899195
						%MHDT	0.345991		1.219388	6.415116	24.27041	0.10164	0.097243	0.367263
						Weighted Average			0.069718	0.605645	1.376449	0.004622	0.004422	0.012665

EMFAC2014 (v1.0.7) Emission Rates
Region Type: County
Region: Los Angeles
Calendar Year: 2021
Season: Annual
Vehicle Classification: EMFAC2007 Categories
Units: miles/day for VMT, trips/day for Trips, g/mile for RUNEX, PMBW and PMTW, g/trip for STREX, HTSK and RUNLS, g/vehicle/day for IDLEX, RESTL and DIURN

Region	CalYr	VehClass	MdlYr	Speed	Fuel	Population	VMT	Trips	ROG_RUNE	CO_RUNEX	NOx_RUNE	PM10_RUN	PM2_5_RU	SOx_RUNEX
Los Angele	2021	HHDT	Aggregatec	Aggregatec	DSL	52019.25	7199666	0	0.150207	0.868512	4.209498	0.018031	0.017251	0.015271
Los Angele	2021	MHDT	Aggregatec	Aggregatec	DSL	73768.84	4152017	0	0.045353	0.198192	1.345779	0.006351	0.006076	0.011019
						% HHDT	0.634238		9.52667	55.08429	266.9822	1.143579	1.094108	0.968561
						%MHDT	0.365762		1.658849	7.249112	49.2235	0.232281	0.222233	0.403021
						Weighted Average			0.111855	0.623334	3.162058	0.013759	0.013163	0.013716

OCSD - Biosolids Master Plan EIR

EMFAC 2014 Values

EMFAC2014 (v1.0.7) Emission Rates
Region Type: County
Region: Los Angeles
Calendar Year: 2018
Season: Annual
Vehicle Classification: EMFAC2007 Categories
Units: miles/day for VMT, trips/day for Trips, g/mile for RUNEX, PMBW and PMTW, g/trip for STREX, HTSK and RUNLS, g/vehicle/day for IDLEX, RESTL and DIURN

Region	CalYr	VehClass	MdlYr	Speed	Fuel	Population	VMT	Trips	ROG_RUNE	CO_RUNEX	NOx_RUNE	PM10_RUN	PM2_5_RU	SOx_RUNEX
Los Angele	2018	HHDT	Aggregatec	Aggregatec	DSL	47954.14	6454031	0	0.174478	0.874386	5.305616	0.026488	0.025343	0.015927
Los Angele	2018	MHDT	Aggregatec	Aggregatec	DSL	67928.9	3691211	0	0.173854	0.562008	3.315401	0.094541	0.090451	0.011166
						% HHDT	0.636163		11.09967	55.62521	337.5238	1.6851	1.612204	1.013186
						%MHDT	0.363837		6.325457	20.44793	120.6264	3.439748	3.290946	0.406272
						Weighted Average			0.174251	0.760731	4.581503	0.051248	0.049031	0.014195