



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

April 26, 2021

Andrew Clough
Deputy General Manager
West County Wastewater District
2910 Hilltop Drive
Richmond, CA 94806

RE: West County Wastewater Comprehensive Energy and Sustainability
Upgrades Project

ALAMEDA COUNTY

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(Secretary)
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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Dear Mr. Clough,

Bay Area Air Quality Management District (Air District) staff has reviewed the Mitigated Negative Declaration (MND) for the proposed West County Wastewater Comprehensive Energy and Sustainability Upgrades Project with the West County Wastewater District (Project). The West County Wastewater District proposes to replace and modernize equipment and infrastructure at the existing Water Quality Resource and Recovery Plant (WQRRP) near Richmond Parkway and Parr Blvd., as well as install solar photovoltaic (PV) generation facilities at several West County Wastewater (WCW) facilities including the WQRRP, Atlas Pump Station, WCW Headquarters (PV facilities and electric vehicle charging stations), Lakeside Pump Station, and Tara Hills Pump Station to reduce energy consumption and improve operational efficiency.

Air District staff commends and supports the Project's purpose to reduce energy consumption and improve operational efficiency. Specifically, the Air District supports the Project's installation of solar energy producing equipment and electric vehicle charging stations, replacement of equipment at the WQRRP with more energy efficient equipment, upgrades to implement a cogeneration process to recover and reuse resources, and efforts to reduce methane emissions through the Project's improvements. In addition, Air District staff support the Project's plan to eliminate use of the sludge drying ponds by installing a centrifuge to de-water sludge and minimize odor impacts.

Consistency with Long-Term State Climate Goals

The MND states that the Project's greenhouse gas (GHG) emissions align with some of the strategies in the City of Richmond's, the City of San Pablo's and Contra Costa County's Climate Action Plans (CAP). However, each of these Plans either does not include reference to target years in alignment with State climate targets or does not reference GHG reductions to be achieved through these existing plans. Air District staff recommends the MND evaluate and demonstrate the Project's consistency with the State's 2030 GHG targets established in SB 32 as reflected in the California Air Resources Board's most recent Scoping Plan.

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Air Quality Impacts

Construction Emissions

Mitigation Measure AIR-1 states that air quality impacts from PM_{2.5} and PM₁₀ due to fugitive dust generated from grading, hauling and other construction-related activities would be mitigated to less than significant through implementation of the Air District's Basic Construction Mitigation Measures. Since the Project is located in an AB 617 community which already experiences a higher burden of air pollution in the Bay Area, staff recommends amending Mitigation Measure AIR-1 to include implementation of Additional Construction Measures (Table 8-3 in BAAQMD CEQA Guidelines) to minimize fugitive dust. These additional measures would benefit the community by further reducing emissions from construction equipment including carbon monoxide (CO), oxides of nitrogen (NOx), directly emitted particulate matter (PM_{2.5} and PM₁₀), and toxic air contaminants such as diesel PM.

Operational Emissions

Though the MND states that operational emissions are expected to decrease upon implementation of the Project, the MND does not disclose or quantify operational emissions under the proposed Project. Air District staff recommends the MND quantify the Project's operational emissions both for the Project and No Project alternative. Specifically, there is a potential for emission increases from the following equipment:

- The waste gas incinerator, when equipment is down or undergoing maintenance. Specific pollutants of concern include the combustion of digester gas and pilot flame fuel (e.g. natural gas), which include NOx, PM₁₀, PM_{2.5}, sulfur dioxide and CO. Other emissions of concern would be from the incomplete combustion of fuel, which consists of organics and hydrogen sulfides; and
- Two new 450 kilowatt (kW) cogeneration systems that would generate power from biogas to provide waste heat for digester heating and drying biosolids, as well as the changes to digester equipment and the sludge/digester gas throughput.

Odors

Because wastewater treatment facilities are common sources of odors, staff recommends consideration and mitigation of potential odors that may arise during the conversion of the existing south sludge drying beds which would become obsolete once the thermal dryer is installed and operational. In addition, the Project will increase its equalization basin storage capacity by 23 million gallons, beyond the existing 53 million gallons of storage capacity. Staff also recommends consideration and mitigation of any potential odors due to the additional storage of influent in these basins, especially during wet weather conditions.

Permits

Several aspects of the project will require changes to the existing air quality permit, as well as an Authority to Construct/Permit to Operate permit for certain elements of the Project. For any questions regarding BAAQMD permits, please contact your assigned permit engineer Alfonso Borja, Supervising Air Quality Engineer, at (415) 749-4694, or aborja@baaqmd.gov.

The Air District's CEQA website contains tools and resources to assist lead agencies in analyzing air quality and GHG impacts. These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>

Air District staff is available to assist the West County Wastewater District in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Kelly Malinowski, Senior Environmental Planner, at (415) 749-8673 or kmalinowski@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director John Gioia
BAAQMD Vice Chair Karen Mitchoff
BAAQMD Director David E. Hudson
BAAQMD Director Mark Ross