



South Coast Air Quality Management District

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October 1, 2014

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**Review of the Draft Mitigated Negative Declaration (MND) for
“International Auto Crafters” Plot Plan No. 2013-210 (PP 2013-210)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised or final Mitigated Negative Declaration (MND), as appropriate.

Based on a review of the Draft MND, the SCAQMD staff is concerned about the potential long-term air quality impacts from the ongoing operation of the proposed project. In the project description, the lead agency proposes to construct a 17,007 square foot automotive body shop, including two heated down-draft paint spray booths. The lead agency provided an analysis of the air quality impacts from mobile sources, energy use, and area sources (which includes emissions from consumer products, landscape equipment, and architectural coatings), however, the “Air Quality and Global Climate Change Impact Analysis” report does not provide a detailed discussion of the potential emissions from coatings and solvent usage associated with the paint spray booths. The SCAQMD staff is concerned that the lead agency determined that the project’s operational air quality and health effect impacts were less than significant without fully quantifying these potentially adverse impacts in the Draft MND.

The SCAQMD staff recommends that the lead agency analyze the project operational air quality impacts by conducting a detailed analysis of potential emissions from the paint spray operations, including all solvent and automotive coatings use. Additionally,

SCAQMD staff recommends that the MND discuss how the project will comply with all applicable SCAQMD rules, including but not limited to: SCAQMD Rule 201- Permit to Construct; Rule 1151- Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations; Rule 1171- Solvent Cleaning Operations; Rule 1147- NOx Reductions from Miscellaneous Sources; and Rule 1401- New Source Review of Toxic Air Contaminants.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Tim Kobata, Air Quality Specialist at (909) 396-2862, if you have any questions regarding these comments. We look forward to reviewing and providing comment for the Final IS/MND associated with this project.

Sincerely,

Jillian Baker

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JB:TK

LAC 140916-04
Control Number