The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

Project Description
The proposed project consists of the demolition of an existing 12-pump gasoline station, relocation of the gas station from its current location to the southern edge within the same commercial plaza, and construction of a new gasoline station with 18 pumps on 11.74 acres.

Air Quality Analysis
In the Air Quality Analysis, the Lead Agency quantified air emissions from area and mobile sources and found that regional and localized construction and operational emissions would be less than significant. The Lead Agency did not include daily operational ROG emissions from the fueling process. The SCAQMD staff believes that the MND has likely underestimated the project’s air quality impacts. Therefore, it is recommended that Lead Agency calculate operational emissions from gasoline refueling and include the calculations in the Final MND.

Compliance with SCAQMD Rules 1149 and 1166
Based on a review of the project description, the SCAQMD staff found that the proposed project would include the removal of an existing gasoline station. The Final MND should include a discussion to demonstrate compliance with the requirements of SCAQMD Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing and SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil.

Pursuant to the CEQA Guidelines Section 15074, prior to approving the proposed project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND.
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 Jack Cheng, Air Quality Specialist, CEQA IGR, at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources