



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

November 28, 2018

TSOC_IS_MND_Comments@octa.net

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OCTA – Capital Programs - Facilities Engineering
550 South Main Street
Orange, CA 92863-1584

Mitigated Negative Declaration (MND) for the Proposed Transit Security and Operations (TSOC) Project

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

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a 30,000-square-foot operations center with a 2,000 gallon aboveground storage tank and associated fueling station (Proposed Project). The Proposed Project is located on the northwest corner of Manchester Avenue and Lincoln Avenue in the City of Anaheim.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant¹. Upon review of the MND, SCAQMD staff found that there are some discrepancies between the CalEEMod run and the information presented in the main body of the MND. Additionally, the Proposed Project will need to obtain a SCAQMD permit for operation. Please see SCAQMD's staffs detailed comments below.

SCAQMD Staff's Comments

Upon review of the CalEEMod output file, SCAQMD staff found that the inputs used for the Proposed Project in CalEEMod include a 27,000-square-foot general office building and 176 parking spaces². However, in the main body of the MND, the Lead Agency described that the Proposed Project would consist of a 30,000-square-foot office building with 190 parking spaces³. This discrepancy may have led to an under-estimation of the Proposed Project's construction and operational emissions. Therefore, SCAQMD staff recommends that the Lead Agency correct this discrepancy to ensure that the emissions from the Proposed Project are accurately accounted for and used to determine the Proposed Project's air quality impacts significance levels in the Final MND.

SCAQMD Permits & Rules

The Proposed Project will include the operation of a 2,000 gallon aboveground storage tank. Pursuant to SCAQMD's Rule 461 – Gasoline Transfer and Dispensing⁴ and Rule 463 – Organic Liquid Storage⁵, a

¹ MND, Chapter 1, page 6.

² MND, Appendix D Air Quality, CalEEMod Annual, Summer and Winter runs, pages 1 of 32 and 1 of 27.

³ MND, Chapter 1, page 6.

⁴ SCAQMD's Rule 461 – Gasoline Transfer and Dispensing. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf>.

permit from SCAQMD would be required for the operation, and SCAQMD should be identified as Responsible Agency under CEQA for the Proposed Project in the Final MND. Additionally, since the operation of gasoline transfer and dispensing emits toxics air contaminants, a Health Risk Assessment (HRA) analysis is required as part of the SCAQMD permitting requirements under SCAQMD's Rule 1401 – New Source Review of Toxic Air Contaminants⁶. Any assumptions used in the air quality and HRA analysis in the final CEQA document will be used as the basis for permit conditions and limits. The Final MND should also demonstrate compliance with applicable SCAQMD Rules, including, but not limited to, Rule 201 – Permit to Construct⁷ and Rule 203 – Permit to Operate⁸.

Should there be any questions on permits, please contact the SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit SCAQMD's webpage at <http://www.aqmd.gov/home/permits>.

Conclusion

Pursuant to 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 SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

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Planning, Rule Development & Area Sources

LS:AM

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Control Number

⁵ SCAQMD's Rule 463 – Organic Liquid Storage. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-463.pdf>.

⁶ SCAQMD's Rule 1401 – New Source Review of Toxic Air Contaminants. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>.

⁷ SCAQMD's Rule 202 – Permit to Construct. Accessed at: SCAQMD's <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

⁸ Rule 203 – Permit to Operate. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.