



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Fedex Ground Parking Lot (Sunshine Lot)

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes a surface parking lot with 130 trailer spaces on five acres to service the existing Fedex facility that in full operation, 24 hours a day (Proposed Project). The Proposed Project would also involve various site improvements, including, but not limited to, a landfill gas extraction system to remove gas contaminants such as volatile organic compounds (VOCs) and other non-methane hydrocarbons¹. Construction is expected to take approximately four months².

South Coast AQMD Staff's Comments

South Coast AQMD staff received a Notice of Public Hearing (Notice) for the Proposed Project on July 3, 2019. Upon a review of the Notice, South Coast AQMD staff found that the MND for the Proposed Project was circulated for a 20-day public review and comment period from May 15, 2019 and June 3, 2019, and that the Lead Agency will consider the adoption of the MND and the approval of the Proposed Project on July 8, 2019. Despite the public circulation, South Coast AQMD staff did not receive the MND for review and subsequently requested it from the Lead Agency for review on July 3, 2019³. Given the limited review time, South Coast AQMD staff is submitting the following comments to the Lead Agency for consideration.

Responsible Agency and South Coast AQMD Permits

The Proposed Project would include, among others, a landfill gas extraction system. It is important to note that generally, operation of portable engines and portable equipment units of 50 horsepower or greater that emit particulate matter require a permit from South Coast AQMD or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)⁴. The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff in advance to determine if there is any diesel-powered equipment that will require a South Coast AQMD permit or if the equipment will need to be registered under the PERP through CARB prior to start of any landfill gas extraction activity. If a permit from South Coast AQMD is required, South Coast AQMD should be

¹ MND. Page. 29.

² MND. Page. 17.

³ E-mail correspondence between South Coast AQMD staff (Ms. Lijin Sun) and City of Santa Fe Springs (Mr. Cuong Nguyen). July 3, 2019.

⁴ South Coast AQMD. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

identified as a Responsible Agency for the Proposed Project in the Final MND. Any assumptions used in the Air Quality Analysis in the Final MND will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

South Coast AQMD Rules

Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil⁵. South Coast AQMD Rule 1166 should be incorporated in the Final ND, where appropriate. Furthermore, the Final ND should also discuss how the landfill gas extraction activity will comply with South Coast AQMD Rule 402 – Nuisance⁶, if VOCs and/or odors are emitted during soil disturbance activities.

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 South Coast AQMD 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, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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⁵ South Coast AQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

⁶ South Coast AQMD. Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.