



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Naval Facilities Engineering Command Southwest  
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Building 1, 3<sup>rd</sup> Floor (Environmental)  
San Diego, CA 92132

## **Environmental Assessment for the Proposed Renewed Fueling Operations at Defense Fuel Support Point San Pedro**

The 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 EA.

### South Coast AQMD Staff's Summary of Project Description and Air Quality Analysis

The Lead Agency proposes to reactive and reuse fueling support facilities and infrastructure for commercial uses on a 207-acre portion of 311 acres (Proposed Action). The EA evaluated two action alternatives and no action alternative as potential development scenarios implement the Proposed Action. Under Alternative 1, the annual construction emissions from the Proposed Action would be below General Conformity Rule de minimis thresholds, except NO<sub>x</sub>, and the annual emissions from continued operations would be below the de minimis thresholds for all pollutants, except VOCs and NO<sub>x</sub><sup>1</sup>. Under Alternative 2, the annual construction emissions from the Proposed Action would be below the de minimis thresholds for all pollutants. Similar to Alternative 1, implementing the Proposed Action under Alternative would not result in exceedances of the de minimis thresholds for all pollutants, except VOCs and NO<sub>x</sub><sup>2</sup>. The Lead Agency is the process of consulting with the South Coast AQMD to confirm that the emissions increase is within the emissions budget outlined in the approved Air Quality Management Plan<sup>3</sup>.

### General Conformity Review Request and Determination

The Clean Air Act requires that federal agencies and public and private entities that receive approvals or funding from federal agencies such as airports and seaports undergo a General Conformity review and determination process in order to demonstrate that emissions from a proposed federal action will not interfere with a state or tribal implementation plan (SIP/TIP) for an area that has been designated by the United States Environmental Protection Agency (U.S. EPA) as a nonattainment or maintenance area for a National Ambient Air Quality Standard (NAAQS). The conformity determination process is intended to demonstrate that a proposed federal action will not: (1) cause or contribute to new violations of a NAAQS; (2) interfere with provisions in the applicable SIP for maintenance of any NAAQS; (3) increase the frequency or severity of existing violations of any standard; or (4) delay the timely attainment of any standard<sup>4</sup>.

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<sup>1</sup> EA. Pages 3-10 and 3-11.

<sup>2</sup> EA. Page 3-12.

<sup>3</sup> EA. Page 1-6.

<sup>4</sup> United States Environmental Protection Agency. *General Conformity*. Accessed at: <https://www.epa.gov/general-conformity/what-general-conformity>.

The South Coast Air Basin (Basin) is designated as extreme non-attainment for ozone and serious non-attainment for PM2.5. To streamline the review process and to facilitate conformity determinations for projects in the Basin, two separate VOC and NOx general conformity budgets were established in the Final 2012 Air Quality Management Plan (AQMP): 1 tons per day (tpd) of NOx and 0.2 tpd of VOC were set aside for this purpose every year, starting in 2013 until 2030. South Coast AQMD has set up a tracking system for projects requiring conformity determinations on a first-come-first-serve basis, whereby the project emissions are debited from the applicable set aside accounts until they are depleted. At the time of preparing this comment letter, South Coast AQMD staff had not received a General Conformity determination request from the Lead Agency for the Proposed Action. Any questions related to the South Coast AQMD General Conformity review process and determination can be directed to Dr. Sang-Mi Lee, Program Supervisor, at [slee@aqmd.gov](mailto:slee@aqmd.gov).

#### South Coast AQMD Permits and Rules

The Defense Fuel Support Point (DFSP) San Pedro facilities are operating under existing South Coast AQMD permits<sup>5</sup>. It is recommended that the Lead Agency consult with South Coast AQMD's Engineering and Permitting staff to determine if any change, such as termination or modification, to existing permits or new permits from South Coast AQMD would be required for implementing the Proposed Action, and if compliance with any applicable South Coast AQMD rules is required and should be discussed in the Air Quality Section of the Final EA. If there is any information in the permitting process suggesting that the Proposed Action would result in significant adverse air quality impacts not analyzed in the Final EA or substantially more severe air quality impacts than those analyzed in the Final EA, the Lead Agency should commit to reevaluating the Proposed Action's air quality impacts. Questions on permits and applicable South Coast AQMD rules can be directed to 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>.

South Coast AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions regarding the enclosed comments.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS  
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<sup>5</sup> EA, Page 3-8.