



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Initial Study/Negative Declaration (IS/ND) for the
Proposed Remedial Action Plan for the Former Mouren-Laurens and Leach Oil Sites
Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The Los Angeles Regional Water Quality Control Board is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD Staff (Staff) has provided a brief summary of the project information and prepared the following comments.

Summary of Proposed Project Information in the IS/ND

Based on the IS/ND, the Proposed Project consists of a series of cleanup to address contamination at the Proposed Project site, which includes petroleum hydrocarbons, chlorinated solvents, and other chemicals of concern. The Proposed Project site is comprised of four parcels at 641, 705, 717, and 719 East Compton Boulevard totaling 3.76 acres (referred to as the former Mouren-Laurens Oil Company Site), and three parcels totaling 2.24 acres at 625 East Compton Boulevard and 15006 South Avalon Boulevard (referred to as the Leach Oil Company Inc Site). Both sites are situated next to each other in an unincorporated portion of Los Angeles County near the City of Compton. The Proposed Project is located within the designated AB617 South Los Angeles community. It is expected that cleanup will take approximately 14 years to be implemented and for the Proposed Project sites to become eligible for a no further action determination from the Lead Agency.

South Coast AQMD Comments

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to Soil Vapor Extraction and air sparging systems, emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. As such, the revised CEQA document should include a discussion about the South Coast AQMD rules that may potentially apply to the Proposed Project. Those rules may include, for example,

Rule 201 – Permit to Construct,¹ Rule 203 – Permit to Operate,² Rule 401 – Visible Emissions,³ Rule 402 – Nuisance,⁴ Rule 403 – Fugitive Dust,⁵ Rule 1166 – VOC Contaminated Soil Excavation,⁶ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,⁷ Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,⁸ etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD changes from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the Final ND should include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for air permit conditions and emission limits. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final ND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the ND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. As such, please provide South Coast

¹ South Coast AQMD. Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

² South Coast AQMD. Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

³ South Coast AQMD. Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

⁴ South Coast AQMD. Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

⁵ South Coast AQMD. Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

⁶ South Coast AQMD. Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

⁷ South Coast AQMD. Rule 1466 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

⁸ South Coast AQMD. Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

AQMD with written responses to all comments contained herein prior to the adoption of the Final ND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final ND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. 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 Sam Wang, Program Supervisor, at swang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

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