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Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Coca-Cola Bottling Plant Dock Expansion and Quad Generation Project (Proposed Project) (SCH No: 2026100355)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The City of Downey is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, which are organized by topic of concern.

Summary of Proposed Project Information in the Draft IS/MND

Based on the Draft IS/MND, the Proposed Project consists of developing: 1) a new 89,889-square-foot (sf) industrial building, referred to as the dock expansion building (Building 8); 2) a new 3,275 sf ingredients cooler (Building 10); 3) a quad generation facility; and 4) associated site improvements.[1] The Proposed Project would occur on approximately 34 acres of the 41-acre Coca-Cola facility located at 8729 Cleta Street in Downey.[2] Building 8 would house manufacturing and handling of bottle caps, empty cans, can wraps, cardboards and would include a new production line, while Building 10 would house raw materials.[3] Although a new production line is included, the Proposed Project would continue to produce 82 million standard physical cases per year, which is the same annual production as existing conditions, without increasing the average daily truck trips.[4] The proposed quad generation facility is designed to produce approximately three megawatts (MW) of electricity to support the operation of the bottling plant and would include installation of new combined heat and power (CHP) units to supply electricity and chilled water to the Coca-Cola facility.[5] The CHP units consist of two 2,146 horsepower (hp) natural gas-fueled internal combustion engines (ICE) equipped with selective catalytic reduction (SCR) and oxidation catalyst systems, and waste heat recovery equipment.[6] Both ICEs are anticipated to operate up to 24 hours per day, six days per week, and 51 weeks per year.[7] In addition, the quad generation system is capable of capturing and recovering carbon dioxide (CO2) from the exhaust of the CHP

[1] Draft IS/MND. p. 3.
[2] *Ibid*. p. 1.
[3] *Ibid*. p. 3.
[4] *Ibid*. p. 4.
[5] *Ibid*.
[6] *Ibid*. p. 41.
[7] *Ibid*.

units and converting it into beverage-grade CO2 for use in the bottling plant.[8] The proposed quad generation facility would include a series of storage tanks, stacks, and electrical equipment, along with a connection to existing utilities within the Coca-Cola facility.[9]

Based on a review of aerial images of the project site, the nearest sensitive receptors are residences located approximately 60 feet to the west of the Proposed Project boundary/fenceline. Construction of Buildings 8 and 10 would begin in 2027 and last 18 months, while the construction of the quad generation facility would begin in 2028 and last 19 months.[10]

South Coast AQMD Comments

Clarification Regarding Project Location

The Draft IS/MND identifies the address of the Proposed Project as 8729 Cleta Street, and according to the South Coast AQMD Facility Information Detail (F.I.N.D) database, that address is associated with two different Facility Identification (ID) numbers: 211371[11] and 39017.[12] However, South Coast AQMD's Engineering & Permitting Division received several permit applications for equipment to be installed at the proposed quad generation facility under a third Facility ID 186291[13] with an address of 11536 Patton Road. A review of Google Maps indicates that 8729 Cleta Street and 11536 Patton Road are both located on the same parcel of land in the city of Downey, and these addresses correspond to one contiguous property associated with the Coca-Cola facility, as shown in Figure 1.

[8] *Ibid*. p. 5.
[9] *Ibid*.
[10] *Ibid*. p. 7.
[11] South Coast AQMD F.I.N.D Database (FID 211371) available at https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=211371
[12] South Coast AQMD F.I.N.D (FID 39017) available at https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=39017
[13] South Coast AQMD F.I.N.D Database (FID 186291) available at https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=186291

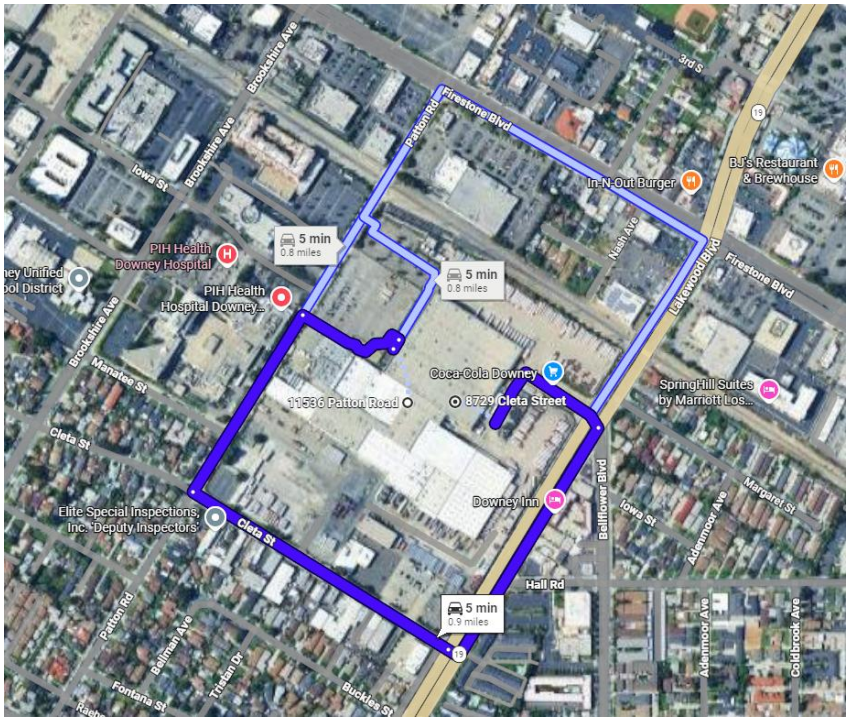


Figure 1: Screenshot from Google Maps showing Both Addresses Tied to the Coca-Cola Facility

Therefore, the Lead Agency is recommended to: 1) confirm which address and corresponding Facility ID is correct for the Proposed Project; 2) explain the relationship, if any, amongst the two addresses and three Facility IDs; and 3) clearly identify and consistently reference throughout the Final MND the correct site address and Facility ID to ensure consistency with the information provided in the South Coast AQMD permit applications and associated documents.

Missing Information Regarding the Existing Permits, Facility Baseline, and Operational Emission Analysis

Based on the F.I.N.D database, Table A shows a summary of the permit applications received by South Coast AQMD's Engineering & Permitting Division under Facility ID No. 186291:

Table A – Applications Received

Application Number	Equipment Description
652602	Selective Catalytic Reduction (SCR)
652603	Natural Gas-Fueled Internal Combustion Engine (ICE)
652604	SCR
652605	Natural Gas-Fueled ICE
652606	Storage Tank Aqueous Urea (Permit Issued on May 21, 2024)
666427	Natural Gas-Fueled Boiler (5-20 MMBTU/Hr)
666428	Natural Gas-Fueled Boiler (5-20 MMBTU/Hr)
666429	Natural Gas-Fueled Boiler (5-20 MMBTU/Hr)

Implementation of the Proposed Project would introduce new stationary equipment, such as the two ICEs and three boilers associated with the proposed quad generation facility. However, it is unclear whether the applications listed in Table A completely represent all of the equipment that will be needed to implement the Proposed Project. These and any unidentified sources may result in incremental changes in emissions of criteria air pollutants and toxic air contaminants (TACs). In addition, the Draft IS/MND claims that while a new production line is proposed, no increase in the number of average daily truck trips above existing conditions is expected in order to continue to produce 82 million standard physical cases of beverages per year. The analysis compared the operational emissions to the applicable South Coast AQMD air quality significance thresholds and concluded less than significant air quality impacts.[14]

However, the Draft IS/MND does not provide sufficient detail regarding the facility's existing air quality permits and the emissions baseline from both the permitted equipment and any other equipment, such as mobile sources that may be exempt from permit requirements that may be currently operating or will operate at the facility post-project. Since the Proposed Project is an expansion of the existing Coca-Cola facility, the operational emissions analysis should clearly identify all existing operations and baseline emissions and all proposed changes, and present the resulting incremental changes in terms of daily and annual emissions to provide documentation to support the conclusion of less than significant air quality impacts.

Therefore, the Lead Agency is recommended to: 1) provide a detailed inventory of the existing South Coast AQMD air permits for the Coca-Cola facility which includes a listing of the permitted equipment and other equipment that may be exempt from permit requirements plus the applicable emission limits and baseline emissions; 2) identify all new stationary sources and mobile sources of equipment required to implement the Proposed Project and quantify their potential emissions post-project; 3) revise the operational emissions analysis to compare the emissions from both existing and Proposed Project operations and calculate the incremental difference between the baseline emissions and post-project emissions; and 4) compare the incremental emissions to the applicable South Coast AQMD air quality significance thresholds, and determine the level of significance of the operational air quality and greenhouse gas (GHG) emission impacts. The revised analysis, including supporting emissions calculations and assumptions, should be incorporated into the Final MND. If the analysis identifies significant operational air quality and GHG emission impacts, all feasible mitigation measures should be identified and incorporated to avoid or reduce those impacts to the fullest extent feasible.

Localized Significance Thresholds During Operation and Discrepancies with Sensitive Receptor Distances

The localized significance threshold (LST) analysis presented in the Draft IS/MND appears to incorrectly rely upon the LST screening tables, which, as noted in Table 3-2 of the LST methodology, are not appropriate for determining the level of significance because the Proposed Project is significantly larger than five acres and involves the use of large combustion sources.[15]

[14] Draft IS/MND. p. 39.
[15] South Coast AQMD Final Localized Significance Threshold Methodology available at https://www.aqmd.gov/docs/defaultsource/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

Specifically, the Draft IS/MND analyzes the LST impacts during operation by relying on the LST Screening Table for Source Receptor Area (SRA) Zone 5 for a project size of five acres and a receptor distance of 150 meters, from the proposed stationary sources associated with the quad generation facility.[16] In addition, the Proposed Project site is approximately 34 acres, which falls into specific categories outlined in Table 3-2 of the LST methodology. Therefore, the Lead Agency is recommended to conduct project-specific air dispersion modeling to accurately assess the localized air quality impacts and include the results in the Final MND.

In addition, the Draft IS/MND identifies the distances between the proposed quad generation facility and sensitive receptors as approximately 492 feet to residences and 330 feet to the hospital.[17] Based on these distances, the hospital appears to be the closest sensitive receptor to the proposed quad generation facility. However, the operational LST analysis relied on 492 feet (150 meters) rather than 330 feet (100 meters), as identified as the hospital. Furthermore, Section D.XIII (Noise) also identifies distances to nearby sensitive receptors that are slightly different than those presented in the Air Quality section, such as the distance from the quad generation facility to the hospital is 425 feet.[18] Therefore, the Lead Agency is recommended to reconcile these discrepancies and revise the analysis accordingly in the Final MND based on the sensitive receptor with the shortest distance to the proposed quad generation facility to ensure that consistent and accurate distances from the Proposed Project and its components are presented and analyzed accurately for the topic of air quality as well as any other topic analyzed in the document that relies on these distances.

Air Quality Impact Analysis of Overlapping Construction and Operation Activities

The Draft IS/MND indicates that construction of Buildings 8 and 10 would not overlap with construction of the quad-generation facility.[19] However, the construction schedule indicates that construction of Building 10 and the quad generation facility would begin in 2028, by which time Building 8 is anticipated to be operational.[20] Therefore, construction activities associated with Building 10 and the quad generation facility could overlap with the operational activities at Building 8, resulting in concurrent emissions from construction equipment and operational sources. However, the Draft IS/MND does not evaluate the potential air quality impacts associated with this overlap or determine whether the combined emissions would exceed applicable air quality significance thresholds.

When construction and operation activities overlap, the combined daily emissions from the overlapping activities should be compared to the South Coast AQMD air quality significance thresholds for operation in order to determine whether the emissions would result in significant adverse air quality impacts. Therefore, the Lead Agency is recommended to conduct the overlapping emissions analysis by comparing the combined daily emissions to the South Coast AQMD operational thresholds of significance and determine whether the resulting impacts are significant. During the overlapping construction and operation activities, if any pollutant exceeds the South Coast AQMD air quality significance thresholds for operation, then the analysis and supporting documentation in the Final MND will need to be revised. In addition, all feasible

[16] Draft IS/MND. p. 45.
[17] *Ibid*. p. 44.
[18] *Ibid*. p. 106.
[19] *Ibid*. p. 6.
[20] *Ibid*. p. 7.

mitigation measures to reduce or eliminate the significant impacts will need to be identified in the Final MND.

Incomplete Greenhouse Gas Analysis

The Draft IS/MND concludes that the Proposed Project would result in less than significant GHG emissions impacts. The analysis references the South Coast AQMD air quality significance threshold for GHG emissions of 10,000 metric tons of CO2 equivalent per year (MTCO2e/yr) for determining the significance of GHG emissions from stationary sources.[21] The Draft IS/MND provides the following reasons to support the less than significant conclusion:

- The Proposed Project would not increase the number of truck trips and would commit to only purchasing electric-powered off-road equipment in the future[22]
- The Proposed Project would produce beverage-grade CO2 on-site, reducing the need to import CO2 by truck and eliminating an estimated 380 truck trips per year[23]
- The Proposed Project would generate up to three MW of electricity on-site, reducing its reliance on electricity supplied by Southern California Edison[24]

However, the Draft IS/MND does not provide a quantitative analysis or supporting calculations that demonstrate that the Proposed Project's annual GHG emissions would remain less than the South Coast AQMD air quality significance threshold for GHG emissions. Although the qualitative reasoning provided may support a potential reduction in a portion of GHG emissions associated with the Proposed Project's operations, the Draft IS/MND neither quantifies the anticipated increase in GHG emissions from construction and operation of the new combustion equipment nor demonstrates how the proposed changes to the facility's operations would affect the total annual emissions.

Therefore, the Lead Agency is recommended to conduct a quantitative GHG emissions analysis, including detailed calculations, assumptions, and supporting documentation, to substantiate the less than significant impact conclusion and include it in the Final MND. The analysis should also discuss post-project scenarios for GHG sources by addressing both construction and all operational GHG sources. GHGs from short-term construction activities are typically amortized over 30 years. To amortize GHGs from temporary construction activities over a 30-year period (estimated life of the project/equipment), the amount of CO2e emissions during construction is calculated and then divided by 30, then added to the operational GHG emissions. In addition, the analysis should identify the relevant GHG emission sources, quantify estimated annual emissions in terms of MTCO2e/yr, and explain how the GHG emissions reductions associated with avoided truck trips, the use of electric-powered off-road equipment, and on-site power generation contribute to the overall emissions estimate.

[21] *Ibid*. p. 72.
[22] *Ibid*. p. 71.
[23] *Ibid*.
[24] *Ibid*.

South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft IS/MND indicates that the Proposed Project would include operation of a quad generation facility consisting of two 2,146 hp natural gas-fueled internal combustion generators, SCR and oxidation catalyst systems, and waste heat recovery equipment.[25] Thus, air permits from South Coast AQMD will be required. The Final MND should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,[26] Rule 203 – Permit to Operate,[27] Rule 401 – Visible Emissions,[28] Rule 402 – Nuisance,[29] Rule 403 – Fugitive Dust,[30] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[31] Regulation XIII – New Source Review,[32] Rule 1401 – New Source Review of Toxic Air Contaminants,[33] etc. It is important to note that when air permits from the South Coast AQMD are required, the role of the South Coast AQMD would change 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 Section 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. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to 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 the permit conditions and emission limits for the air permit(s). 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.

[25] *Ibid*. p. 41.
[26] South Coast AQMD. Rule 201 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[27] South Coast AQMD. Rule 203 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[28] South Coast AQMD. Rule 401 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[29] South Coast AQMD. Rule 402 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[30] South Coast AQMD. Rule 403 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[31] South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[32] South Coast AQMD. Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[33] South Coast AQMD. Rule 1401 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf

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 MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to Public Resources Code Section 21092.5(b) and 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 and notify each public agency when any public hearings are scheduled. 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, detailed reasons supported by substantial evidence in the record which explains why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, 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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov or me at swang1@aqmd.gov should you have any questions.

Sincerely,

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