



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:
a.velasco@lomitacity.com

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Ms. Alicia Velasco, Principal Planner
City of Lomita
24300 Narbonne Ave.,
Lomita, CA 90717

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed
Picerne Lomita Apartments**

The 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. The Lead Agency proposes to construct a multifamily residential development.

The proposed project is adjacent to a gasoline service station. A Health Risk Assessment (HRA) was performed to disclose the potential health risks to the residents from the gasoline dispensing station. The HRA indicates that the analysis followed SCAQMD's recommended methodology; however, SCAQMD staff has concerns that the HRA underestimated emissions and health risks to the surrounding residents. Details are included in the attachment.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely

Jillian Wong

Jillian Wong Ph.D.
Planning & Rules Manager
Planning, Rule Development & Area Sources

JW:JC
LAC161103-02
Control Number

Attachment

1. The Lead Agency estimated emissions from the gasoline service station (SCAQMD Facility ID# 158808) at one million gallons of gasoline per year. The facility is currently permitted to dispense up to 7.8 million gallons of gasoline per year. By using a lower throughput, the HRA understates emissions and health risks from the gasoline service station. SCAQMD staff recommends revising the analysis based on the gas station's permitted annual throughput.
2. Source # 1 (Gas8) is modeled as a volume source with a 1 meter release height. Source # 1 does not include emissions from spillage during refueling. Spillage and refueling should be modeled as separate sources. Spillage emissions should be assumed to be released at ground level.
3. Source # 2 (Gas4) is modeled as a volume source with a 1 meter release height. Source # 2 does not include emissions from spillage during refueling. Spillage and refueling should be modeled separate sources. Spillage emissions should be assumed to be released at ground level.

For additional gasoline station modeling guidance, please visit:

http://www.aqmd.gov/docs/default-source/planning/risk-assessment/gas_station_hra.pdf

4. Additionally, the Conoco Phillips/Torrance Tank Farm (SCAQMD Facility ID# 111814) and Phillips 66 Pipeline LLC (SCAQMD Facility ID# 171327) are located immediately west of the proposed project. SCAQMD staff recommends including the toxic emissions from these facilities when analyzing the potential health risks.
5. Limits to Enhanced Filtration Units

The HRA indicates that Minimum Efficiency Report Value (MERV) of 11 or higher will be required by the City's building code.

The Lead Agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters¹ similar to those proposed for this project, costs were expected to range from \$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed mitigation assumes that the filters operate 100 percent of the time while residents are indoors and does not account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters also have no ability to filter out any toxic gasses. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

¹ This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 11 or better filters. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>.