



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

November 14, 2018

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Attn: Daniel Rosas, Assistant Planner
City of Rialto
150 South Palm Avenue
Rialto, CA 92376

Mitigated Negative Declaration (MND) for the Proposed Casmalia - Ayala Gas Station Project

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 CEQA document.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a gas station with 12 fuel dispensers, a 3,000-square-foot drive thru restaurant, a 3,500-square-foot convenience store, and an 8,500-square-foot retail building on 2.98 acres. The project is located on the southwest corner of Casmalia Street and Ayala Drive in the City of Rialto.

SCAQMD Staff's Comments

The Lead Agency determined the proposed project would have less than significant impacts to regional and localized air quality during construction and operation.¹ However, it does not appear that operational air quality impacts were adequately analyzed. Additionally, the proposed project will need to obtain a SCAQMD permit for operation.

Operational Impacts

Upon review of the MND, it does not appear that the air quality analysis included operational ROG emissions generated from storage tanks or from the fueling process. This may have likely led to an under-estimation of the proposed project's operational air quality impacts. Therefore, it is recommended that the Lead Agency quantify and disclose operational emissions from the fueling process in the final CEQA document.

SCAQMD Permits and Rules

Pursuant to SCAQMD's Rule 461 – Gasoline Transfer and Dispensing, a permit from SCAQMD would be required, and SCAQMD should be identified as a responsible agency under CEQA for the proposed project in the final CEQA document. Additionally, any assumptions used in the air quality and HRA analysis in the final CEQA document will be used as the basis for permit conditions and limits.² The final CEQA document should also demonstrate compliance with applicable SCAQMD Rules, including, but not limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate.

Should there be any questions on permits, please contact the SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit SCAQMD's webpage at <http://www.aqmd.gov/home/permits>.

¹ MND, Pages 52-55.

² The Lead Agency assumed a throughput of 1.5 million gallons per year to determine the proposed project's cancer risk of 6.2 in one million.

Response to Comments

Pursuant to CEQA Guidelines Section 15074, prior to approving the proposed project, the Lead Agency shall consider the final CEQA document for adoption together with any comments received during the public review process. Please provide SCAQMD staff with written responses to the comment contained herein prior to the adoption of the final CEQA document. When responding to issues raised in the comments, responses 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 or useful to decision makers and the public who are interested in the proposed project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Jillian Wong

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Planning and Rules Manager

Planning, Rule Development & Area Sources

JW/AM

RVC181107-06

Control Number