



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

July 6, 2018

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Mitigated Negative Declaration (MND) for the Proposed House Foods Expansion Project

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 CEQA document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to expand an existing tofu manufacturing operation by constructing a 36,763-square-foot building, which will connect an already developed 125,040 square-foot, two story building (Building A) to an already developed 81,613 square-foot two story building (Building B). The project is located at 7351 and 7421 Orangewood Avenue on the northwest corner of Western Avenue and Orangewood Avenue (proposed project). The proposed project will include, among other things, a new mechanical equipment room¹.

SCAQMD Permits and Rules

Upon review, SCAQMD staff found that the current building under operation, Building A, is a permitted SCAQMD facility². In the event that the proposed project's new mechanical equipment room and/or the future use of Building B also requires permits from the SCAQMD, the SCAQMD should be identified as a responsible agency for the proposed project in the final CEQA document. The assumptions in the air quality analysis in the final CEQA document will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Permitting questions can be directed to SCAQMD Engineering and Permitting staff at (909) 396-3385. The final CEQA document should also discuss how the proposed project will comply with applicable SCAQMD rules, including, but may not be limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, and Rule 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters.

Conclusion

Pursuant to 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. Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final MND. When responding to issues raised in the comments, response 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 to the public who are interested in the proposed project.

¹ MND, *Project Description*. Page 2-19.

² South Coast Air Quality Management District. [Facility Information Detail \(FIND\)](#).

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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, if you have any questions.

Sincerely,

Daniel Garcia

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

DG/AM

ORC180622-01

Control Number