



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Alder/Renaissance Project

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a 7,948-square-foot convenience store, a 2,542-square-foot drive-thru restaurant, 11 fuel islands with 16 fueling pumps and four diesel pumps, and a total of 6,476 square feet of fueling canopies on 4.2 acres (Proposed Project). The Proposed Project is located on the southeast corner of the intersection of Renaissance Parkway and Alder Avenue within the City of Rialto. Construction is anticipated to last 12 months, with operations beginning in 2021¹. Once operational, the fueling portion of the Proposed Project would have an annual throughput of 6,167,040 gallons of gasoline and 14,600,000 gallons of diesel fuel². Based on a review of the MND and aerial photographs, South Coast AQMD staff found that the nearest sensitive receptors (e.g., residential uses) are located approximately 2,750 feet west of the Proposed Project³.

South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment

In the Air Quality Analysis Section of the MND, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. The Lead Agency also quantified volatile organic compounds (VOCs) emissions from gasoline transfer and dispensing operations⁴, which would result in 24.57 pounds per day (lbs/day)⁵. The Lead Agency found that the Proposed Project's air quality impacts would be less than significant⁶. In the MND, the Lead Agency also discussed⁷ the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*, which recommends avoiding siting sensitive receptors within 300 feet of a large gas station⁸. The Lead Agency did not perform a health risk assessment in the MND⁹. However, because the nearest sensitive receptors are located 2,750 feet away, the Lead Agency found that the

¹ MND. Page 34.

² *Ibid.* Page 38.

³ *Ibid.* Page 39

⁴ The Lead Agency used the US EPA "Potential to Emit Calculator for Gasoline Dispensing Facilities" spreadsheet. Accessed at: <https://www.epa.gov/sites/production/files/2016-06/gasolinedispensingcalculator032315.xlsx>.

⁵ MND. Page 38.

⁶ MND. Page 47 through 40.

⁷ MND. Page 23.

⁸ A large gasoline dispensing facility is defined with a throughput of 3.6 million gallons per year or greater. California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. Accessed at: <https://www.arb.ca.gov/ch/handbook.pdf>.

⁹ MND. Page 41.

Proposed Project would not result in significant incremental increases in potential cancer risks to surrounding sensitive receptors.

South Coast AQMD Staff's Comments

Health Risk Assessment (HRA)

As stated above, the Proposed Project includes, among others, operation of 11 fueling islands with 16 gasoline fueling pumps and four diesel fueling pumps. Because the Proposed Project includes a diesel fueling portion that is estimated to have an annual throughput of 14,600,000 gallons¹⁰ of diesel fuel, the Proposed Project is capable of attracting diesel-fueled trucks that will visit the Proposed Project for fueling. Based on a review of the Traffic Impact Analysis in the MND, South Coast AQMD staff found that the Proposed Project would likely result in 1,066 diesel truck trips per day¹¹. While the nearest sensitive receptors are located 2,750 feet away from the Proposed Project, South Coast AQMD staff recommends that the Lead Agency perform a mobile source health risk assessment¹² in the Final MND as substantial evidence to support that sensitive receptors are not going to be adversely affected by the exposure to diesel particulate matter that will be emitted from diesel-fueled trucks that will visit the Proposed Project for fueling during operation. Additionally, operation of the fueling portion of the Proposed Project has the potential to expose nearby residents to toxic air contaminants such as benzene. It is also recommended that the Lead Agency evaluate, quantify, and perform a health risk assessment for the gasoline service station¹³ and compare cancer risk to South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹⁴ to determine the level of significance in the Final MND as substantial evidence to support the conclusion that the Proposed Project's air quality impact to sensitive receptors from exposure to air toxic contaminants would be less than significant.

CEQA Air Quality Analysis for Operational Impacts

In the Air Quality Analysis and Greenhouse Gas Section, the Lead Agency quantified the maximum unmitigated VOCs emissions from the gasoline transfer and dispensing operations to be 24.57 lbs/day¹⁵, which would result in a total of 38.89 lbs/day VOCs emissions during the Proposed Project's operation¹⁶. To quantify those emissions, the Lead Agency used a combined VOCs emission factor of 1.88 lbs per 1,000 gallons of gasoline per day from storage tank filling, storage tank breathing losses, and dispensing that the U.S. Environmental Protection Agency (U.S. EPA) has developed¹⁷.

Operation of the gasoline fueling portion of the Proposed Project requires permits from South Coast AQMD. Gasoline emission factors for retail service stations from five processes (loading, breathing,

¹⁰ MND. Page 38.

¹¹ South Coast AQMD staff calculated the daily truck trips that will visit the Proposed Project based on information from Appendix I: Traffic Impact Analysis. The "Total PCE Trips" listed in *Table 2: Project Trip Generation* on PDF Page 81 within Appendix I: Traffic Impact Analysis (8,529 PCE) were multiplied by the estimated vehicle mix (%) listed in Table 14: Truck Gas Station Vehicle Mix within the Air Quality and Greenhouse Gas Analysis (37.5%), and then divided by PCE factor of 3 which was referenced on page 165 of the MND. Approximately 1,066 truck trips per day were likely visit the Proposed Project during operation for fueling (8,529 *0.375)/3.

¹² Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

¹³ South Coast AQMD. Risk Assessment. Available at: <http://www.aqmd.gov/home/permits/risk-assessment>.

¹⁴ South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

¹⁵ Air Quality and Greenhouse Gas Section. Table 21: Regional Operational Emissions – Unmitigated. Page 6-7.

¹⁶ *Ibid.*

¹⁷ *Ibid.* Air Quality and Greenhouse Gas Impact Study. Page 4-7. US EPA "Potential to Emit Calculator for Gasoline Dispensing Facilities" spreadsheet. Accessed at: <https://www.epa.gov/sites/production/files/2016-6/gasolinedispensingcalculator032315.xlsx>.

refueling, hose permeation, and spillage) in the South Coast AQMD Risk Assessment Procedures for Rules 1401, 1401.1 and 202 are being used for determining VOCs emission factors for permit applications¹⁸. South Coast AQMD staff recommends providing justification for using the U.S. EPA's VOCs emission factor to calculate VOCs emissions from the gasoline transfer and dispensing operations in the Final MND.

Permits and Compliance with South Coast AQMD Rules

In the MND, the Lead Agency identified South Coast AQMD as a public agency whose approval may be required¹⁹. Since the Proposed Project includes, among others, operation of 16 gasoline fueling pumps, permits from South Coast AQMD will be required, and South Coast AQMD should be clearly identified as a Responsible Agency under CEQA for the Proposed Project in the Final MND. The assumptions used in the air quality analysis and health risk assessment in the Final MND will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology²⁰ is being used by South Coast AQMD for determining operational health impacts for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

The MND included a discussion of South Coast AQMD Rule 461 – Gasoline Transfer and Dispensing²¹ that the gasoline fueling portion of the Proposed Project must comply during operation. The Final MND should also include a discussion to demonstrate how the gasoline fueling portion of the Proposed Project will comply with applicable South Coast AQMD Rules, including, but not limited to, Rule 201 – Permit to Construct²², Rule 203 – Permit to Operate²³, Rule 431.2 – Sulfur Content of Liquid Fuels²⁴ and Rule 1401 – New Source Review of Toxic Air Contaminants²⁵.

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 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, 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, informative, or useful to decision makers and the public who are interested in the Proposed Project.

¹⁸ South Coast AQMD's Risk Assessment Procedures for Rules 1401, 1401.1 and 2.12. Accessed at: <http://www.aqmd.gov/home/permits/risk-assessment>.

¹⁹ MND. Page 19.

²⁰ Office of Environmental Health Hazard Assessment. "Notice of Adoption of Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015". Accessed at: <https://oehha.ca.gov/air/crnrr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.

²¹ South Coast AQMD. Rule 461 – Gasoline Transfer and Dispensing. Accessed at: <https://www.aqmd.gov/docs/default-source/compliance/Gas-Dispensing/rule-461.pdf>.

²² South Coast AQMD. Rule 201 – Permit to Construct. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

²³ South Coast AQMD. Rule 203 – Permit to Operate. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

²⁴ South Coast AQMD. Rule 431.2 – Sulfur Content of Liquid Fuels. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431-2.pdf>.

²⁵ South Coast AQMD. Rule 1401 – New Source Review of Toxic Air Contaminants. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>.

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 Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov, should you have any questions.

Sincerely,

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Planning, Rule Development & Area Sources

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