



South Coast
Air Quality Management District

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E-mailed: August 11, 2010
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Mr. Jeff Juarez
Department of Regional Planning
County of Los Angeles
320 West Temple Street
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**Review of the Draft Initial Study (Draft IS) for the
New 40,000 barrel Conoco Phillips Fuel Storage Tank-Project No. R2006-03771**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final environmental document as appropriate.

Based on a review of the draft Initial Study (IS) the AQMD staff is concerned about potential localized air quality impacts to sensitive receptors adjacent to the project site, therefore, AQMD staff recommends that the lead agency perform a localized significance analysis to determine whether the proposed project creates any localized air quality impacts. Also, AQMD staff recommends that the lead agency revise the draft IS to include the maximum individual cancer risk (MICR) value from ethylbenzene. In the event that the lead agency finds any significant air quality impacts from the proposed project the AQMD staff recommends that the lead agency consider all feasible mitigation measures to reduce these impacts.

AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

cc: Art Arreola
Attachment

[IM:DG](#)

LAC100709-05
Control Number

Toxics and Other Non-Criteria Pollutants

1. In Table Five (Summary of Tier 2 Risk Assessment Analysis for MICR and Chronic Hazard Index) of the application backup information that is provided in the draft IS the lead agency indicates that a MICR value is not available for the toxic air contaminant ethylbenzene. However, an inhalation cancer potency factor of $8.7e-3$ (mg/kg-d)⁻¹ has been approved by the Office of Environmental Health Hazard Assessment (OEHHA) and the California Air Resources Board (ARB). Therefore, the AQMD staff recommends that the lead agency revise the Table Five in the draft IS to include the MICR value for ethylbenzene. The inhalation cancer potency factors for ethylbenzene and other toxic air contaminants are available at: <http://www.arb.ca.gov/toxics/healthval/healthval.htm>

Localized Air Quality Analysis

2. According to the environmental setting described on page one of the draft IS the proposed project is adjacent to sensitive receptors (i.e., single family residences). As a result, the AQMD staff is concerned about the potential localized air quality impacts to these residences given their close proximity to the proposed project. Therefore, the AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs).

LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts. Therefore, when revising the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at:

<http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>. In the event that the lead agency finds any significant localized air quality impacts from the proposed project the AQMD staff recommends that the lead agency consider all feasible mitigation measures to reduce construction air quality impacts.