



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:
Frank.Quon@lacity.org

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Mr. Frank Quon, Project Planner
City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

**Draft Initial Study/Mitigated Negative Declaration (DMND) for the Proposed
Construction of a New Gasoline Station Project Located at 12625-33 N. Glenoaks
Bldv and 14071 W. Hubbard Street in Sylmar
(MND-NG-14-340-PL; ENV-2013-2369)**

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.

Project Description

The proposed project includes construction of a new gasoline station with five-dispensers, two-underground storage tanks, a kiosk and associated fueling components on a 0.51-acre site that was previously used as a gasoline station. If soil export is required to remediate contaminated soil, soil export and import activities should be included in the project description and incorporated into any applicable air quality analysis, e.g., the amount of soil export and import, distances to the soil disposal and import sites, the number of haul trips involved, etc.. Phasing information including overlapping phases should also be included in the Final MND.

Air Quality Analyses

The Lead Agency has determined that project air quality impacts would be potentially significant without mitigation during construction and operations but did not quantify project air quality impacts for either short- or long-term activities. Without quantifying project air quality impacts, the lead agency has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act. Guidance for evaluating regional and localized impacts is available at the SCAQMD website.^{1 2 3} Should the lead agency conclude after its analyses that

¹ Guidance for using the current California Emission Estimator Model (CalEEMod) <http://www.aqmd.gov/ceqa/models.html> to estimate project short- and long-term emissions.

construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures⁴ in addition to the mitigation included in the DMND starting on page two of the DMND to be implemented if the air quality impacts are determined to be significant.

Compliance With SCAQMD Rules and Permit Requirements

Besides estimating construction and operational air quality impacts, the Lead Agency should describe compliance with SCAQMD rules and regulations in the Final MND including, but not limited to, Rule 402 – Nuisance; Rule 403 – Fugitive Dust; and Rule 1166 – Volatile Organic Compound (VOC) Emissions From Decontaminated Soil, if VOC emissions are encountered during soil disturbance activities. Finally, the fueling dispensing equipment will require SCAQMD permits under Rule 461 - Gasoline Transfer and Dispensing. Permit questions pertaining to gasoline dispensing equipment can be directed to SCAQMD Engineering & Compliance staff at (909) 396-2551.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JB:RM:GM

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² Guidance for estimating Localized Significance Threshold Impacts:
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

³ Calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook: <http://www.aqmd.gov/ceqa/hdbk.html> .

⁴ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html