



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:

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JGuevara@santa-ana.org

Jerry C. Guevara, Assistant Planner I
City of Santa Ana, Planning Division
20 Civic Center Plaza (P.O. Box 1988)
Santa Ana, CA 92701

Mitigated Negative Declaration (MND) for the Proposed 7-Eleven Convenience Store and Service Station

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 demolish a 1,610-square-foot restaurant, and construct a 2,480-square-foot convenience store, an 810-square-foot gasoline service canopy with two pumps, and two 20,000-gallon underground storage tanks on 0.15 acres (Proposed Project). Construction of the Proposed Project is expected to begin in October 2019 and last seven months¹.

Responsible Agency, Air Permit, and Compliance with South Coast AQMD Rules

Since the Proposed Project includes the operation of a gasoline service station with two pumps and installation of underground storage tanks, a permit from South Coast AQMD will be required, and South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. 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 Final MND should also include discussions to demonstrate compliance with applicable South Coast AQMD Rules, including, but not limited to, Rule 201 – Permit to Construct², Rule 203 – Permit to Operate³, Rule 461 – Gasoline Transfer and Dispensing⁴, Rule 1170 – Methanol Compatible Fuel Storage and Transfer⁵, and Rule 1401 – New Source Review of Toxic Air Contaminants⁶. It is important to note that assumptions used in the air quality and health risks analyses in the Final MND will be used as the basis for permit conditions and limits. If there is any information in the permitting process suggesting that the Proposed Project would result in significant adverse air quality and/or health risks impacts not discussed in the Final MND or substantially more severe air quality and/or health risks impacts than those discussed in the Final MND, the Lead Agency should commit to reevaluating the Proposed Project's air quality and health risks impacts through a CEQA process (CEQA Guidelines Section 15162). The 2015 revised Office of Environmental Health

¹ MND. Page. 26.

² South Coast AQMD. Rule 201 – Permit to Construct. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

³ South Coast AQMD. Rule 203 – Permit to Operate. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

⁴ South Coast AQMD. Rule 461 – Gasoline Transfer and Dispensing. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf>.

⁵ South Coast AQMD. Rule 1170 – Methanol Compatible Fuel Storage and Transfer. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1170.pdf>.

⁶ 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>.

Hazard Assessment (OEHHA) methodology⁷ 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.

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

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 me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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⁷ 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/crn/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.