



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 Shell Compressed Natural Gas Dispensing Station Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments include information on South Coast AQMD's permits that the Lead Agency should include in the Final MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct and operate a compressed natural gas (CNG) compound and dispensing station at the existing Shell Carson Distribution facility that will include two compressors, one dryer, three CNG storage tanks, three CNG fuel dispensers, and a 2,700-square-foot fuel canopy on a 16,220-square-foot portion of a 448-acre site (Proposed Project). The Proposed Project will also include construction and operation of a 3,200-linear-foot natural gas pipeline. The Proposed Project is located at 20945 South Wilmington Avenue on the northwest corner of South Wilmington Avenue and East Dominguez Street within the City of Carson. Additionally, the Proposed Project's location is within the community boundary for the designated AB 617 Wilmington, Carson, West Long Beach community. Construction is anticipated to begin in 2021 and will be completed in four months, with full operations by 2022¹. Once operational, the Proposed Project's CNG station would enable the conversion of seven existing delivery trucks from diesel to CNG². Based on a review of the MND and aerial photographs, South Coast AQMD staff found that the Proposed Project will be located approximately 540 feet north of existing residential uses³.

South Coast AQMD Staff's Summary of the Air Quality Analysis

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. Based on the analysis, the Lead Agency found that the Proposed Project's regional and localized air quality impacts from both construction and operational activities would be less than significant⁴.

¹ MND. Pages 18 to 19.

² MND. Page 1.

³ MND. Page 21.

⁴ MND. Pages 18 to 24.

South Coast AQMD Consultation, Permitting, and CEQA Responsible Agency

The Lead Agency proposes to operate a CNG compound, which will include the following three pieces of equipment that will be used to prepare CNG for dispensing at the facility: one dryer and two compressors. The Lead Agency anticipates that the two compressors will be rated at 250-horsepower⁵. The horsepower rating of the dryer was not made available in the MND. Due to horsepower rating, operation of the compressors, and possibly the dryer, may require permits to construct and operate from South Coast AQMD. As such, the Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if any permits will be required. If permits from South Coast AQMD are required, the Lead Agency should identify South Coast AQMD as a Responsible Agency in the Final MND (CEQA Guidelines Section 15381). The assumptions used in the air quality analysis in the Final MND will be the basis for evaluating the permit(s) under CEQA and imposing permit conditions and limits. Questions on permits should be directed to 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: <http://www.aqmd.gov/home/permits>.

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. 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 Alina Mullins, Air Quality Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM

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Control Number

⁵ MND. Page 5.