



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:

January 22, 2020

IOrozco@santa-ana.org

Ivan Orozco, Assistant Planner II
City of Santa Ana, Planning Division
20 Civic Center Plaza (PO Box 1988)
Santa Ana, CA 92701

Mitigated Negative Declaration (MND) for the Proposed Euclid-Hazard 7-Eleven Service 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 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 3,045-square-foot convenience store, a gasoline service station with eight fueling pumps, and a 1,800-square-foot fueling canopy on 0.64 acres (Proposed Project). The Proposed Project is located at 813 North Euclid Street on the southeast corner of North Euclid Street and West Hazard Avenue within the City of Santa Ana. Construction was modeled in CalEEMod to begin in March 2020 and be completed by July 2020, with operations beginning thereafter¹. Once operational, the Lead Agency estimated that the Proposed Project's gasoline service station would have an annual throughput of 1,500,000 gallons of gasoline². Based on a review of the MND and Figure 1: *Project Local Study Area*, South Coast AQMD staff found that the Proposed Project is located adjacent to existing religious uses to the east and residential uses to the south³.

Permits and Compliance with South Coast AQMD Rules

Since the Proposed Project includes the operation of a gasoline service station with eight fueling pumps, a permit from South Coast AQMD will be required. The Lead Agency identified South Coast AQMD as a Responsible Agency under CEQA for the Proposed Project in the MND⁴. The Lead Agency also included in the MND discussions on applicable South Coast AQMD rules⁵, including Rule 201 – Permit to Construct⁶, Rule 203 – Permit to Operate⁷, Rule 461 – Gasoline Transfer and Dispensing⁸, and Rule 1401 – New Source Review of Toxic Air Contaminants⁹. 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>. Any assumptions used in the Air Quality and Health Risk

¹ MND. Appendix A: *Air Quality, GHG, and Energy*. CalEEMod 831 N Euclid St Gas Station -Orange County, Summer "Construction Phase". PDF Page 78.

² MND. Section 5.3: Air Quality. Page 50.

³ *Ibid*. Page 40.

⁴ MND. Section 3.5: Project Description. Page 13.

⁵ Appendix A: *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis*. Pages 20 – 21.

⁶ South Coast AQMD. Rule 201 – Permit to Construct. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

⁷ South Coast AQMD. Rule 203 – Permit to Operate. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

⁸ South Coast AQMD. Rule 461 – Gasoline Transfer and Dispensing. Accessed at: <https://www.aqmd.gov/docs/default-source/compliance/Gas-Dispensing/rule-461.pdf>.

⁹ 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>.

Assessment (HRA) analyses in the Final MND will be used as the basis for permit conditions and limits. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology¹⁰ 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. If there is any information in the permitting process suggesting that the Proposed Project would result in significant adverse air quality and health risks impacts not analyzed in the Final MND or substantially more severe air quality and health risks impacts than those analyzed 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).

South Coast AQMD Staff's Summary of the Air Quality and HRA Analyses

In the Air Quality Analysis Section of the MND, the Lead Agency quantified the Proposed Project's construction and operational emissions, including Reactive Organic Gas (ROG) generated from storage tanks and fueling processes¹¹, and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized air quality impacts would be less than significant¹². Additionally, the Lead Agency used South Coast AQMD's Emissions Inventory and Risk Assessment Guidelines for Gasoline Dispensing Stations from 2007 to analyze the health risk impact from operating the Proposed Project's gasoline dispensing station. Based on the analysis, the Lead Agency found that operation of the Proposed Project's gasoline dispensing station would not expose sensitive receptors to a cancer risk greater than 6.17 in one million, which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹³.

South Coast AQMD Staff's Comments on the HRA Analysis

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. As stated above, the Proposed Project includes, among others, the operation of a gasoline service station with eight fueling pumps. The Proposed Project has the potential to expose nearby residents to toxic air contaminants, such as benzene, which is a known carcinogen.

To analyze the potential health risks to sensitive receptors from the exposures to benzene during the operation of the gasoline service station, the Lead Agency used South Coast AQMD's Emissions Inventory and Risk Assessment Guidelines for Gasoline Dispensing Stations, dated January 2007¹⁴. However, in 2017 South Coast AQMD updated the Risk Assessment Procedures for Rules 1401, 1401.1 and 212 (Version 8.1). Version 8.1 was updated to incorporate the 2015 revised OEHHA guidelines, the latest five years of available meteorological data from 2010 through 2016 for all screening tables, and used U.S. EPA's air quality dispersion model AERMOD Version 16216r. The Risk Assessment Procedures (Version 8.1) is being used for determining operational health impacts for permit applications deemed complete on or after October 1st, 2017. Therefore, South Coast AQMD staff recommends that the

¹⁰ 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/cnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.

¹¹ MND. Appendix A: *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis*. "7.2 Gasoline Transfer and Dispensing Modeling". Page 39.

¹² MND. Section 5.3: Air Quality. Pages 43 through 51.

¹³ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

¹⁴ MND. Appendix A: *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis*. "Operations-Related Toxic Air Contaminant Impact". Pages 52 through 53.

Lead Agency revise the HRA analysis and recalculate cancer risk in the Final MND by using the Risk Assessment Procedures (Version 8.1), which can be found on South Coast AQMD's website here: <http://www.aqmd.gov/home/permits/risk-assessment>.

Guidance on Siting Gasoline Dispensing Facilities Near Sensitive Receptors

South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* in 2005¹⁵. Additionally, the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* recommends a 300-foot separation between sensitive land uses and a large gasoline dispensing facility (defined as a facility with a throughput of 3.6 million gallons per year or greater, which should be based on a maximum permitted annual throughput). A 50-foot separation is recommended for typical gasoline dispensing facilities¹⁶. These guidance documents provide recommendations that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. Therefore, South Coast AQMD staff recommends that the Lead Agency review and consider these guidance documents when making local planning and land use decisions.

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, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM
ORC200108-01
Control Number

¹⁵ South Coast AQMD. May 2005. "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning" Accessed at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

¹⁶ California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. Page 32. Accessed at: <https://www.arb.ca.gov/ch/handbook.pdf>.