



**South Coast**  
**Air Quality Management District**  
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Mr. Lawson Chew, Planning Assistant  
City of Gardena  
1700 W. 162<sup>nd</sup> St.,  
Gardena, CA

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed**  
**Sam's Club Fueling Station Project**

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 MND. The Lead Agency proposes to construct a gasoline fueling station capable of dispensing approximately 7 million gallons of fuel annually.

Since the proposed project includes a gasoline service station, a permit from SCAQMD would be required and the SCAQMD should be identified as a responsible agency under CEQA for this project. The Final MND should also demonstrate compliance with SCAQMD Rules, including but not limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, and Rule 461 – Gasoline Transfer and Dispensing. If there are permitting questions concerning the gasoline service station, they can be directed to Engineering and Permitting Staff at (909) 396-2551.

The Lead Agency determined that the project's regional operational air quality impacts would be less than significant. However, the air quality analysis did not include emissions generated from the operation of the gasoline service station equipment. It is important to note that while the CalEEMod model quantifies mobile source emissions (e.g., trip visits by patrons) associated with operating a gasoline service station, the model does not quantify the operational stationary source emissions from the storage tanks and fueling equipment. Thus, the SCAQMD staff recommends quantifying operational stationary source emissions and incorporating those emissions into the analysis. Should the Lead Agency determine after revising the air quality analysis that project operational air quality impacts will exceed the SCAQMD recommended regional daily significance thresholds, the SCAQMD staff recommends the incorporation of mitigation measures into the project description and air quality analysis in the Final MND to reduce those impacts below significant levels.

Furthermore, in the Air Quality Analysis, the Lead Agency utilizes SCAQMD's Screening-Level Health Risk Assessment but does not provide sufficient supporting documentation or calculations. The SCAQMD staff recommends that the Lead Agency clarify or provide their calculations and specify the meteorological monitoring station, downwind distance, and corresponding cancer risk (in one million) in Final MND.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely

*Jillian Wong*

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Planning, Rule Development & Area Sources

JW:JC

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