



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:

September 26, 2018

Joanne.Coletta@CoronaCA.gov

Joanne Coletta, Community Development Director
City of Corona, Community Development Department
400 South Vicentia Avenue
Corona, California 92882-2187

Mitigated Negative Declaration (MND) for the Proposed All American Asphalt Mine Permit Amendment 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 CEQA document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to amend the current permit for the All American Asphalt Surface Mine. The permit modifications include extending permitted operations for an additional 100 years, reducing the mining boundary from 298 acres to 263 acres, increasing mineral extraction from 112 to 177 million tons, increasing mining depth from 500 feet to 400 above mean sea level, and relocation of the processing plant.¹ The project is located at 1776 All American Way in the City of Corona.

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency has determined that the proposed project will not have significant impacts during operation. However, the lead agency did not analyze the impacts associated with moving the processing equipment within the property/facility.

Permits and Compliance with SCAQMD Rules

The proposed project includes the relocation of the processing equipment which is currently permitted by the SCAQMD. SCAQMD staff has concerns regarding the relocation without proper analysis according to Rule 1401 – New Source Review of Toxic Air Contaminants, which states:

“The removal of a permit unit from one location within a facility and installation at another location within the facility is a relocation only if an increase in maximum individual cancer risk in excess of one in one million (1.0 x 10E-6) or a Hazard Index of 1.0 occurs at any receptor location.”

The potential increase in maximum individual cancer risk resulting from the proposed relocation of the processing equipment within the property/facility was not analyzed by the lead agency. Therefore, SCAQMD staff recommends that the lead agency demonstrate compliance with Rule 1401 in the final CEQA document by including the necessary analysis.² Additionally, the proposed project has the potential to create fugitive dust during the relocation period and overall facility operations. Therefore,

¹ MND. Project Description, Pages 1-2.

² South Coast Air Quality Management District, 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>.

the final CEQA document should also include a discussion of compliance with SCAQMD Rule 403 – Fugitive Dust and 403(e) – Additional Requirements for Large Operations.³

If the proposed project will alter the facility's current processes, require new equipment, require equipment alternations/and or relocation of any permitted equipment, SCAQMD staff shall be promptly notified to ensure SCAQMD requirements are met and maintained. For more information on permits, please visit the SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. If there are permitting questions, they can be directed to Engineering and Permitting Staff at (909) 396-3385.

Closing

Pursuant to CEQA Guidelines Section 15074, prior to approving the proposed project, the lead agency shall consider the final CEQA document for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the final CEQA document. 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 or useful to decision makers and the public who are interested in the proposed project.

SCAQMD 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,

Daniel Garcia

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

DG/AM

RVC180911-14

Control Number

³ South Coast Air Quality Management District, Rule 403 –Fugitive Dust. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.