



January 30, 2019

Job No. 3-417-0633

SUBJECT: MITIGATED NEGATIVE DECLARATION (MND) FOR THE PROPOSED ALDER PLAZA (CUP NOS. 810-812, PRECISE PLAN OF DESIGN NO. 2452, ENVIRONMENTAL ASSESSMENT REVIEW NO. 16-26)
Proposed Retail Project
SE Adler Avenue and Casmalia Street
Rialto, California

Salem Engineering Group Inc. (SALEM) has addressed each comment and responses are cited below stating a description of SALEM's actions to appropriately address them.

SCAQMD Comment:

Since the Proposed Project includes the operation of a diesel fuel station in addition to the operation of an existing gasoline station, a permit or modification to an existing permit from SCAQMD would be required, and SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. The assumptions in the air quality analysis in the Final MND will be the basis for permit conditions and limits. The Final MND should also demonstrate compliance with applicable SCAQMD Rules, including, but are 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 SCAQMD Engineering and Permitting staff at (909) 3962551.

SALEM Response: The City of Rialto will add SCAQMD to the MND as a Responsible Agency. In addition, this proposed development will comply with all Rules 201, 203 and 461 as required by the State of California Air Board and South Coast Air Quality Management District. As these permits require Construction Documents the developer will submit these Construction Documents once they have been completed and signed by the Engineer of Record. All construction documents will comply with the Rules stated above.

SCAQMD Comment: In the Air Quality analysis, the Lead Agency found that the Proposed Project's regional and localized construction and operational air quality impacts would be less than significant. However, it did not appear that the Air Quality analysis included operational ROG emissions generated from storage tanks or from the fueling process during operation. This may have likely led to an under-estimation of the Proposed Project's operational air quality impacts. It is important to note that while CalEEMod4 quantifies mobile source emissions (e.g., trip visits by patrons) associated with operating a gasoline service station, CalEEMod does not quantify the operational stationary source emissions from the storage tanks and fueling equipment. Therefore, it is recommended that the Lead Agency use its best efforts to quantify and disclose operational emissions from the fueling process in the Final MND.

SALEM Response: The existing throughput in gallons for Gasoline and Diesel is 450K/52.4K per month and the proposed throughput with the addition of one Diesel pump is an additional 17.5k per month. The SCAQMD looks at the operational release from fuel stations for gasoline pumps. This release will add additional ROG lbs/day with the operation of the gasoline pumps. Based on the CARB Dispensing Facility Emission Factor for gasoline stations in operation, the factor ratio of 0.74 per 1,000 gallons-per-day, the ROG pounds-per-day will be $11.1 \sim 11.5$ ($[450K \times 0.74]/30 = 11.1 \sim 11.5$). The current AQA showing this shopping center is at a ROG 9 lbs/per day in which the significance threshold set by SCAQMD is 55 lbs/per day. Therefore, the ROG total with the potential release is 20.5 which is still significantly lower than the limit set by SCAQMD.

The throughput was also reviewed in regard to cancer causing chemicals in close proximity to sensitive receptors. The calculation provided by the SCAQMD excel software showed that the throughput stated above would not significantly affect the sensitive receptors in proximity to the fueling station. See attached calculation.

GASOLINE DISPENSING SERVICE STATION

(Procedure Version 8.1 & Package N, September 1, 2017) - Risk Tool V1.1

AN:	Fuel Station
Facility Name:	Rialto Fuel Station
Deem Complete Date:	2019

Storage Tank Type	Underground	MET Station	Fontana
Annual Throughput	5.4 million gallons /year	Distance to Resident	600 meter
T-BACT	YES	Distance to Commercial	10 meter

MICR Calculation: MICR = MICR per 1 Million gallons/yr x Annual Throughput (Million gallons/yr)

HIA & HIC Calculation: Negligible compared to Cancer risk and is not calculated.

MICR Result

	Resident	Commercial
MICR	0.116	1.474
MICR ≤ 10	PASS	PASS

Interpolation for MICR from Nearest Distances

	Residential			Commercial		
	near	actual	far	near	actual	far
Distance (meter)	500	600	1000	10	10	25
MICR (per 1 million gasoline gallon throughput per year)	0.025	0.0214	0.007	0.273	0.273	0.273

Look up from Table 12 - MICR for Underground Storage Tank

Station	Receptor	Downwind Distance (m)							
		25	50	75	100	200	300	500	1000
Fontana	Resident	3.306	1.254	0.677	0.423	0.124	0.060	0.025	0.007
	Commercial	0.273	0.103	0.056	0.035	0.010	0.005	0.002	0.001