

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

**Final Environmental Assessment for:**

**Proposed Amended Rule 307.1 – Alternative Fees for Air Toxics Emissions Inventory;**

**Proposed Amended Rule 1401 – New Source Review of Toxic Air Contaminants;**

**Proposed Amended Rule 1402 – Control of Toxic Air Contaminants from Existing Sources;**

**SCAQMD Public Notification Procedures for Facilities Under the Air Toxics “Hot Spots” Information and Assessment Act (AB 2588) and Rule 1402; and, SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk Reduction Program**

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## PREFACE

This document constitutes the Final Environmental Assessment (EA) for Proposed Amended Rule 307.1 - Alternative Fees for Air Toxics Emissions Inventory; Proposed Amended Rule 1401 - New Source Review of Toxic Air Contaminants; Proposed Amended Rule 1402 - Control of Toxic Air Contaminants from Existing Sources; SCAQMD Public Notification Procedures for Facilities Under the Air Toxics “Hot Spots” Information and Assessment Act (AB 2588) and Rule 1402; and, SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk Reduction Program. The Draft EA was released for a 30-day public review and comment period from August 23, 2016 to September 22, 2016. The environmental analysis in the Draft EA concluded that the proposed project would not generate any significant adverse environmental impacts. One comment letter was received relative to the Draft EA. The comment letter and the response to comments are included in Appendix D.

In addition, subsequent to release of the Draft EA, minor modifications were made to the proposed project. To facilitate identification, modifications to the document are included as underlined text and text removed from the document is indicated by ~~striketrough~~. To avoid confusion, minor formatting changes are not shown in underline or striketrough mode.

Staff has reviewed the modifications to the proposed project and concluded that none of the revisions constitute: 1) significant new information; 2) a substantial increase in the severity of an environmental impact; or, 3) provide new information of substantial importance relative to the draft document. As a result, these revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5 and §15088.5. Therefore, this document now constitutes the Final EA for the proposed project.

# CHAPTER 1

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## PROJECT DESCRIPTION

### **Introduction**

**Proposed Amended Rules 307.1, 1401, & 1402 and Associated Rule 1402 Guidance Documents**

### **Affected Facilities**

### **Legislative Authority**

### **California Environmental Quality Act**

### **Project Location**

### **Project Background**

**Summary of SCAQMD Rules 307.1, 1401, & 1402 and Associated Rule 1402 Guidance Documents**

### **Project Description**

**Emission Control Technologies for Toxics**

## **BACKGROUND**

On March 6, 2015, the California Office of Environmental Health Hazard Assessment (OEHHA) approved revisions to their Risk Assessment Guidelines (Revised OEHHA Guidelines). The Revised OEHHA Guidelines were triggered by the passage of the Children's Health Protection Act of 1999 (SB 25, Escutia) requiring OEHHA to ensure infants and children are explicitly addressed when assessing risk. Over the past decade, advances in science have shown that early-life exposures to air toxics contribute to an increased estimated lifetime risk of developing cancer, or other adverse health effects, compared to exposures that occur in adulthood. The new risk assessment methodology addresses this greater sensitivity and incorporates the most recent data on infants and childhood and adult exposure to air toxics. The Revised OEHHA Guidelines incorporate age sensitivity factors and other changes which will increase estimated cancer risk to residential and sensitive receptors, based on the change in methodology, by approximately 3 times, and more than 3 times in some cases depending on whether the toxic air contaminant has multiple pathways of exposure in addition to inhalation. Health risks for off-site worker receptors are similar between the existing and revised methodology because the methodology for adulthood exposures remains relatively unchanged. The Revised OEHHA Guidelines do not reflect the significant toxic emission reductions already achieved by facilities in the Basin over the past decades. Instead, the Revised OEHHA Guidelines represents a change to the methodologies and calculations used to estimate health risk based on the most recent scientific data on exposure, childhood sensitivity, and breathing rates. Even though there may be no increase in toxic emissions at a facility, the estimated cancer risk using the Revised OEHHA Guidelines is expected to increase resulting in some facilities that previously were below public notification thresholds now having to provide public notification.

At the June 2015 Governing Board Meeting, the SCAQMD Governing Board adopted amendments to Rule 1402 – Control of Toxic Air Contaminants ~~Substances~~ from Existing Sources (Rule 1402) incorporating the Revised OEHHA Guidelines. During the 2015 rulemaking process, some industry stakeholders had commented that even though a facility's emissions remained the same or reduced emissions, with the Revised OEHHA Guidelines their estimated health risk may require the facility to conduct a public notification. As a result, the Governing Board directed staff to work with stakeholders to incentivize early risk reductions beyond those required under Rule 1402, to assess public notification procedures, and explore alternatives for such facilities. In addition, the Governing Board also directed staff to streamline implementation of Rule 1402, if necessary.

## **PROPOSED AMENDED RULES 307.1, 1401, AND 1402 AND ASSOCIATED RULE 1402 GUIDANCE DOCUMENTS**

Proposed Amended Rule (PAR) 1402 will be amended to streamline implementation to achieve risk reductions sooner and to allow facilities to use an alternative public notification approach if they implement early measures that reduce facility health risks at least 60% below Rule 1402 Action Risk Levels. Facilities that do not use this voluntary program would still be subject to the traditional regulatory approach to reduce risks and notify the public if risks exceed Rule 1402 thresholds. In addition, PAR 1402 includes additional requirements for facilities that are designated as Potentially High Risk Level Facilities, and includes other amendments to improve clarity.

In addition to proposed amendments to Rule 1402, amendments to Rule 307.1 – Alternative Fees for Air Toxics Emissions Inventory and Rule 1401 – New Source Review of Toxic Air

Contaminants are being proposed. PAR 307.1 will be amended to include a fee for Voluntary Risk Reduction facilities and a provision to either directly pay or reimburse the SCAQMD for costs associated with public meetings required by Rule 1402 when a facility is required to provide public notification. PAR 307.1 has been updated to reference North American Industry Classification System (NAICS) codes instead of Standard Industrial Classification (SIC) codes and replaces references to California Air Pollution Control Officers Association (CAPCOA) Air Toxics “Hot Spots” Program Facility Prioritization Guidelines, July 1990 with the most current version of SCAQMD “Facility Prioritization Procedures For The AB 2588 Program”. Additional amendments have been made to PAR 307.1 to improve clarity. As discussed later, SCAQMD staff has reviewed PAR 307.1 and determined that it is exempt from CEQA and a Notice of Exemption will be filed.

Amendments to Rule 1401 and 1402 will remove provisions that require staff to report to the Governing Board regarding changes from OEHHA regarding new or revised toxic air contaminant health values but instead discuss these changes and the potential impacts to permitting and AB 2588 in the AB 2588 Annual Report. Two supporting documents will also be presented to the Governing Board with PAR 1402 for the Governing Board’s approval. The SCAQMD AB 2588 Public Notification Procedures document “Public Notification Procedures for Phase I and II Facilities Under Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588)” is being revised to clarify PAR 1402 notification requirements that are specified in PAR 1402. This document is also being renamed as “SCAQMD Public Notification Procedures for Facilities Under the Air Toxics “Hot Spots” Information and Assessment Act (AB 2588) and Rule 1402”. ~~and a New~~ “SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk Reduction Program” has have been developed to establish and implement PAR 1402 Voluntary Risk Reduction procedures. Collectively, these two documents are referred to herein as “associated Rule 1402 guidance documents.”

There are no expected environmental impacts from PAR 1401 and the associated PARRule 1402 ~~associated~~ guidance documents because changes to these rules and guidance documents are administrative in nature and do not require or cause any physical damage to the environment. PAR 1402 may cause environmental impacts, and this Final~~Draft~~ EA is a comprehensive environmental document that analyzes potential adverse environmental impacts from the currently proposed amendments to Rule 1402.

## **AFFECTED FACILITIES**

To date, there have been 1,640 facilities in the AB 2588 Air Toxics Hot Spots program. Because of inactivity (out of business, shutdown, etc.), low Priority Scores or low risk, 1,301 facilities are exempt. Of the 339 core facilities, the previous rule development process incorporating the Revised OEHHA Guidelines estimated that 22 facilities could potentially have a cancer risk greater than the Action Risk Level, 42 facilities could potentially have a cancer risk greater than the Public Notification Risk Level, and 28 facilities would likely need to submit a Health Risk Assessment (HRA) because of the Revised OEHHA Guidelines. All 64 facilities with a cancer risk greater than the Public Notification Risk Level or the Action Risk Level have a previously approved HRA below the Action Risk Level and are not likely to be a Potentially High Risk Level Facility making them eligible to participate in Voluntary Risk Reduction. Under PAR 1402, facilities participating in Voluntary Risk Reduction are required to implement risk reduction measures specified in a Voluntary Risk Reduction Plan to reduce the impact of total facility emissions below the Voluntary Risk Threshold by no later than two and a half years. Therefore, participating Voluntary Risk

Reduction facilities may be required to add additional pollution controls beyond Rule 1402 requirements.

Implementation of PARs 307.1, 1401, 1402 and the associated PAR 1402 guidance documents affects many industry categories. SCAQMD staff evaluated the primary and secondary toxic drivers for the AB 2588 facilities that could potentially participate in Voluntary Risk Reduction. Based on this evaluation, SCAQMD staff estimated the types of pollution controls that could be potentially used to reduce the impact of total facility risk below the Voluntary Risk Threshold. Rule 1402 establishes a “facility-wide” risk threshold, so there are a variety of options which can be implemented such as process changes, additional air pollution controls, and reduced throughput. The affected facilities are in the AB 2588 Air Toxics Hot Spots program and must submit toxic reports on a quadrennial cycle.

For the 22 facilities that could potentially be greater than Action Risk Level, the March 2015 Staff Report estimated the types of controls that would bring the impact of total facility emissions below Action Risk Level (March 2015 Staff Report Table 3-2). Upon further analysis, two facilities were removed because their current Priority Scores were estimated to be less than ten and nine facilities were removed because the facilities are currently in risk reduction implementation, subject to a different rule that will result in risk reduction, or have installed air pollution controls. For eight of the facilities, staff estimated that the controls that SCAQMD staff reported in the March 2015 Staff Report would be sufficient to reduce facility risk below the Voluntary Risk Threshold. Therefore, of the 22 facilities potentially greater than Action Risk Level, three facilities would require additional controls to reduce their risk below the Voluntary Risk Threshold.

For the 42 facilities identified as potentially having a cancer risk between the Public Notification Risk Level and Action Risk Level when using the Revised OEHHA Guidelines, staff conducted a similar analysis. Twenty facilities were removed because the facilities are in the process of shutting down, currently in risk reduction implementation, subject to a different rule that will result in risk reduction, have installed pollution controls, or their current Priority Scores were estimated to be less than ten. Staff also identified three additional facilities now with a current Priority Score greater than ten. For these remaining 25 facilities, staff estimated the types of pollution controls that could be added to potentially reduce their risk below the Voluntary Risk Threshold. Subsequently, staff assumed that four of the facilities would not participate in Voluntary Risk Reduction due to the high cost of the air pollution control required to bring their facility risk below Voluntary Risk Threshold. Therefore, of the 42 facilities potentially greater than Public Notification Risk Level, it is estimated that 21 facilities would require additional controls.

Therefore, it is estimated that 24 facilities would require additional controls (three Action Risk Level facilities and 21 Public Notice Risk Level facilities). Table 2-1 shows the different categories of affected facilities.

Based on comments from PAR 1402 working group stakeholders, staff is considering an additional provision to allow facilities that do not have an approved HRA to participate in the Voluntary Risk Reduction Program. For those facilities, it is assumed that these facilities will only be required to complete emissions calculations, risk characterizations, and/or a Risk Reduction Measure (i.e. source test, process change, curtailment, etc.) to satisfy Rule 1402 requirements. If they would be allowed to participate in the Voluntary Risk Reduction Program, it is assumed that they would not require any additional controls to reduce risk.

## **LEGISLATIVE AUTHORITY**

The California Legislature created the SCAQMD in 1977 (Lewis-Presley Air Quality Management Act, California Health and Safety Code §§ 40400 et seq.) as the agency responsible for developing and enforcing air pollution control rules and regulations in the Basin and portions of the Salton Sea Air Basin and Mojave Desert Air Basin. By statute, SCAQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance with all state and federal ambient air quality standards for the District [California Health and Safety Code §40460(a)]. Furthermore, SCAQMD must adopt rules and regulations that carry out the AQMP [California Health and Safety Code, §40440(a)].

In addition to regulating criteria pollutants, state law specifies that air districts may regulate toxic air contaminants (TACs). Specifically, Health and Safety Code §39656, through the California legislature has delegated the air districts, including the SCAQMD, to establish and implement a program to regulate TACs. Similarly, SCAQMD implements the Air Toxics Hot Spots Act (Health and Safety Code §44300-44394) through Rule 1402.

## **CALIFORNIA ENVIRONMENTAL QUALITY ACT**

The adoption of PARs 307.1, 1401, and 1402 (which affect new and modified permitted equipment at existing facilities), and the associated Rule 1402 guidance documents, are discretionary actions which have the potential to result in direct or indirect changes to the environment; therefore, is considered a “project” as defined by the California Environmental Quality Act (CEQA). SCAQMD is the lead agency for the proposed project and has prepared this Final~~Draft~~ EA pursuant to its Certified Regulatory Program (CEQA Guidelines § 15251).

SCAQMD staff has reviewed PAR 307.1, pursuant to CEQA Guidelines §15002(k)(1) – Three Step Process, and CEQA Guidelines §15061 – Review for Exemption, and has determined that PAR 307.1 is exempt from CEQA for the following reasons. The proposed amendments to Rule 307.1 are strictly administrative in nature, consisting of including a fee for Voluntary Risk Reduction facilities and a provision to either directly pay or reimburse the SCAQMD for costs associated with public meetings required by Rule 1402 when a facility is required to provide public notification. PAR 307.1 has been updated to reference North American Industry Classification System (NAICS) codes instead of Standard Industrial Classification (SIC) codes and the most current version of associated documents. Because these amendments are strictly administrative in nature, it can be seen with certainty that there is no possibility that the proposed project may have a significant adverse effect on the environment. Additionally, PAR 307.1 is statutorily exempt from CEQA requirements pursuant to ~~State~~-CEQA Guidelines §15273 – Rates, Tolls, Fares, and Charges. A Notice of Exemption ~~will be~~ has been prepared pursuant to CEQA Guidelines §15062 - Notice of Exemption. The Notice of Exemption will be filed with the county clerks of Los Angeles, Orange, Riverside and San Bernardino counties immediately following the adoption of the proposed project.

The current version of Rule 1401 includes provisions for analyzing potential permitting impacts and reporting to the Governing Board when OEHHA revises health values for new and existing toxic air contaminants. ~~Consistent with Both~~ PAR 1402, and PAR 1401 will remove these provisions and instead, include this analysis in the AB 2588 annual report to streamline implementation. PAR 1401 will remove paragraphs (e)(2) and (e)(3) which requires staff to report to the Governing Board regarding OEHHA changes to risk values.

Hence, there are no expected environmental impacts from PAR 1401 and the associated ~~PAR~~Rule 1402 guidance documents because changes to these rules and guidance documents are administrative in nature and do not require or cause any physical damage to the environment.

As a result, this ~~Draft~~Final EA is a comprehensive environmental document that analyzes and focuses on potential adverse environmental impacts from the currently proposed amendments to Rule 1402. California Public Resources Code §21080.5 allows public agencies with regulatory programs to prepare a plan or other written document in lieu of an environmental impact report or negative declaration once the Secretary of the Resources Agency has certified the regulatory program. SCAQMD's regulatory program was certified by the Secretary of the Resources Agency on March 1, 1989, and is codified as SCAQMD Rule 110.

CEQA and SCAQMD Rule 110 require that potential adverse environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, this ~~Final~~Draft EA addresses the potential adverse environmental impacts associated with implementing PAR 1402 according to CEQA Guidelines § 15252. It states that the lead agency has an obligation to identify and evaluate the environmental effects of the project. The ~~Final~~Draft EA is an informational document intended to: (a) provide the lead agency, responsible agencies, decision makers and the general public with information on the environmental effects of PAR 1402; and, (b) identify possible ways to minimize the significant effects.

SCAQMD's review shows that PAR 1402 is not expected to generate significant adverse effects on the environment. Pursuant to CEQA Guidelines §§ 15126.4 (a)(3), and 15126.6, mitigation measures and alternatives are not required for effects which are not found to be significant, thus, no mitigation measures or alternatives to the project are included in the ~~Final~~Draft EA. In addition, because SCAQMD has a certified regulatory program, the Environmental Assessment is an appropriate substitute for an EIR or Negative Declaration. Pursuant to CEQA Guidelines § 15252(a)(2)(B) and supported by the environmental checklist (in Chapter 2), if the project would not have any significant or potentially significant effect on the environment, "no alternatives or mitigation measures are proposed to avoid or reduce any significant effects on the environment." ~~Comments received on the Draft EA during the 30-day public review period will be addressed and included in the Final EA.~~ The Draft EA was released for a 30-day public review and comment period from August 23, 2016 to September 22, 2016. One comment letter was received on the Draft EA during the comment period. The comment letter, along with the response to the comments, are included in Appendix D of this document. Subsequent to release of the Draft EA, modifications were made to the proposed project. Staff has reviewed the modifications to the proposed project and concluded that none of the modifications constitute: 1) significant new information; 2) a substantial increase in the severity of an environmental impact; or, 3) provide new information of substantial importance relative to the draft document. As a result, these revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5 and §15088.5.

Prior to making a decision on the proposed project, the SCAQMD Governing Board must review and certify that the Final EA complies with CEQA as providing adequate information on the potential adverse environmental impacts of the proposed project. None of the comments in the letter alter any conclusions reached in the Draft EA, nor provide new information of substantial importance relative to the draft document.

## **PROJECT LOCATION**

The proposed project would apply to equipment and processes operated at toxic emitting facilities located throughout the entire SCAQMD jurisdiction. The SCAQMD has jurisdiction over an area of 10,473 square miles, consisting of the four-county South Coast Air Basin (Basin) and the Riverside County portions of the Salton Sea Air Basin (SSAB) and the Mojave Desert Air Basin (MDAB). The Basin, which is a subarea of the SCAQMD's jurisdiction, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The 6,745 square-mile Basin includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The Riverside County portion of the SSAB and MDAB is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley. The federal nonattainment area (known as the Coachella Valley Planning Area) is a subregion of both Riverside County and the SSAB and is bounded by the San Jacinto Mountains to the west and the eastern boundary of the Coachella Valley to the east (see Figure 1-1).



Figure 1-1 Boundaries of the South Coast Air Quality Management District

## **PROJECT BACKGROUND**

SCAQMD has a robust and comprehensive air toxics regulatory program that consists of rules to address new and modified toxic sources, AB 2588 facilities (existing toxic sources), and source-specific toxic rules. Rules 1401 and 1402 are referred to as the “umbrella” rules that specify requirements for all new and modified permitted sources (Rule 1401) and requirements for the existing sources under the Air Toxics Hot Spots program (Rule 1402). In addition to these umbrella toxics rules, SCAQMD’s regulatory program includes over fifteen source-specific toxic rules regulating specific equipment or industry categories such as chrome plating, asbestos remediation, lead emission reductions, perchloroethylene dry cleaners, diesel internal combustion engines to name a few. Implementation of these programs has resulted in significant reductions in toxic emissions. Since the development of SCAQMD’s Air Toxics Program in 1990, non-diesel cancer risks have been reduced between 75 to 87 percent, depending on the location within the Basin.

## **SUMMARY OF SCAQMD RULES 307.1, 1401, 1402 AND ASSOCIATED RULE 1402 GUIDANCE DOCUMENTS**

### **RULE 307.1**

Rule 307.1 – Alternative Fees for Air Toxics Emissions Inventory was initially adopted on May 10, 1996. The rule establishes a fee schedule to recover the cost of implementing and administering the Air Toxics “Hot Spots” Information and Assessment Act of 1987.

### **RULE 1401**

Rule 1401 – New Source Review for Toxic Air Contaminants was adopted by the SCAQMD Governing Board in June 1990. The rule establishes cancer and non-cancer health risk requirements for new, relocated, or modified permitted sources of toxic air pollutants. Under Rule 1401, new and modified permitted sources cannot exceed a Maximum Individual Cancer Risk (MICR) of 1 in one million or a non-cancer hazard index of 1.0, if the source is not equipped with Best Available Control Technology for toxics (T-BACT). If T-BACT is installed, the MICR cannot exceed 10 in one million. The MICR is the estimated probability of a potential maximally exposed individual contracting cancer as a result of exposure to toxic air contaminants. A hazard index below 1.0 indicates that adverse non-cancer health effects are not expected. Rule 1401 also has requirements for cancer burden which represents the estimated increase in the occurrence of cancer cases in a given population due to exposure to TACs. The rule also includes non-cancer chronic and acute hazard thresholds. Rule 1401 has been amended several times to add or modify new compounds or risk values to the list of TACs as they are identified and risk values are finalized or amended by the state.

### **RULE 1402**

Rule 1402 – Control of Toxic Air Contaminants from Existing Sources was adopted in April 1994. Rule 1402 establishes facility-wide risk requirements for existing facilities that emit TACs and implements the state AB 2588 Air Toxics “Hot Spots” program. It contains requirements for toxic emissions inventories, health risk assessments, public notification and risk reduction. A maximum individual cancer risk exceeding 10 in one million or a non-cancer hazard index greater than 1.0, as demonstrated by an approved HRA, requires a facility to conduct public notification. A maximum individual cancer risk of 25 in one million or a non-cancer hazard index greater than 3.0, as demonstrated by an approved HRA, requires a facility to reduce their facility-wide risk within three years of

submitting a Risk Reduction Plan, with an option to request time extensions. Any facility whose facility-wide emissions of TACs exceed the significant risk level of 100 in one million or a non-cancer hazard index of 5.0 is not allowed to ask for a time extension.

### **ASSOCIATED RULE 1402 GUIDANCE DOCUMENTS**

The SCAQMD AB 2588 Public Notification Procedures document “Public Notification Procedures for Phase I and II Facilities Under Air Toxics ‘Hot Spots’ Information and Assessment Act of 1987 (AB 2588)” are guidelines on how to properly mail notices, hold public meetings, and notify via the web.

A “Draft SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk Reduction Program” has been developed to instruct operators on how to properly submit a PAR 1402 Voluntary Risk Reduction Plan.

### **PROJECT DESCRIPTION**

A description of PARs 307.1, 1401, 1402 and the associated ~~PAR~~Rule 1402 guidance documents are provided below.

#### ***Proposed Amendments to Rule 307.1***

PAR 307.1 includes a new category of billing for facilities in the voluntary risk reduction program, a provision to reimburse the SCAQMD for logistics costs associated with public meetings required by Rule 1402, updates to reference NAICS codes instead of SIC codes, replaces references to California Air Pollution Control Officers Association (CAPCOA) “Air Toxics ‘Hot Spots’ Program Facility Prioritization Guidelines, July 1990” with the most current version of SCAQMD “Facility Prioritization Procedures For AB 2588 Program,” and minor clarifications.

#### ***Proposed Amendments to Rule 1401***

Rule 1401 includes provisions for analyzing potential permitting impacts and reporting to the Governing Board when OEHHA revises health values for new and existing toxic air contaminants. Consistent with PAR 1402, PAR 1401 will remove these provisions and instead include this analysis in the AB 2588 annual report to streamline implementation. PAR 1401 only removes the staff requirement to report to the Governing Board regarding OEHHA changes to risk values. Staff will continue to analyze impacts on permitting when TACs are added or revised and report these changes in the SCAQMD AB 2588 Annual Report. The AB 2588 Annual Report will include an impact assessment for changing the risk values.

#### ***Proposed Amendments to Rule 1402***

PAR 1402 includes provisions for the Voluntary Risk Reduction Program, Potentially High Risk Facilities, and provisions to better clarify submittal and approval of Air Toxic Inventory Reports, Health Risk Assessments, and Risk Reduction Plans. Other proposed amendments are designed to streamline implementation and improve clarity.

#### ***Proposed Guidance Documents to Rule 1402***

Two supporting documents will also be presented to the Governing Board with Proposed Amended Rule 1402. The SCAQMD AB 2588 Public Notification Procedures document “Public Notification Procedures for Phase I and II Facilities Under Air Toxics ‘Hot Spots’ Information and Assessment Act of 1987 (AB 2588)” is being revised to clarify PAR 1402 notification requirements that are specified in PAR 1402. This document is also being renamed as “SCAQMD

Public Notification Procedures for Facilities Under the Air Toxics “Hot Spots” Information and Assessment Act (AB 2588) and Rule 1402.”—and a A “Draft SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk Reduction Program” has been developed to establish PAR 1402 Voluntary Risk Reduction procedures.

## **EMISSIONS CONTROL TECHNOLOGIES FOR TOXICS**

To comply with the risk limits, certain existing sources, which have been identified as potentially exceeding the significant and public notice risk levels in Rule 1402, may need to implement risk reduction measures that include the following:

- Product reformulation and substitution
- Production system modifications, operational standards or practices modifications
- System enclosure and emission capture, exhaust, control or conversion
- Alternative technologies

Several of these risk reduction measures are facility specific (i.e., operational standards and reduction in operating hours).

The use of the most appropriate control technologies is dependent on:

- the physical characteristics and chemical properties of the regulated substances;
- the concentration of the regulated substance;
- design parameters such as the exhaust flow rate, temperature, and pressure of the air to be controlled; and
- the removal and destruction efficiency of the collection and control equipment needed to comply with the requirements of the appropriate rule.

In order to determine which control technology will be used to control a specific TAC, the regulated TACs were categorized by physical and/or chemical properties. Generally, the TACs comprise the following general categories and sub-categories.

- Toxic inorganic aerosols and particulate matter (T-PM)
  - Metal particles
  - Mineral/fiber particles
  - Inorganic acid aerosols
- Toxic volatile organic compounds (T-VOC)
  - High boiling point (>150°C)
  - Medium boiling point (100 - 150°C)
  - Low boiling point (<100°C)
  - Polar organic compounds

- Nonpolar organic compounds
  - Aromatic compounds
  - Carbonyls
- 
- Toxic halogenated organic compounds (T-HOC)
    - Fluorinated compounds
    - Chlorinated compounds
    - Brominated compounds
    - Dioxins and furans

Control technologies that can be applied to control TACs generally are categorized into the following groups:

- Filtration for T-PM
- Wet scrubbing for inorganic compounds
- Thermal and catalytic oxidation
- Refrigerated condensation
- Carbon adsorption and combined adsorption-oxidation systems
- Chemical absorption for T-VOC
- Special combination systems for the control of T-HOC.

A description of available control technologies expected to be used by affected facilities to comply with PAR 1402 is provided in the following section.

### **Control Technology for Toxic Aerosols and Particulate Matter (T-PM)**

Table 1-1 identifies typical filtration control equipment for T-PM. Filtration control techniques are characterized by high removal efficiency and moderate- to high-energy requirements in most applications. In order to achieve high removal efficiencies, dry filters must be made of extremely low porosity materials which impose a high resistance to the flow of gas, or pressure drop (expressed in inches of water column where one inch of water column equals 0.43 pounds per square inch absolute) through the filter media. The higher the pressure drop across a control device, the higher the electrical energy requirement to operate larger fan motors needed to overcome the flow resistance. Therefore, high-efficiency controls are also high-energy controls with correspondingly high operating costs.

Table 1-1 Filtration Controls for T-PM and T-Aerosols

CONTROL TECHNOLOGY	SUBSTANCE GROUP	CONTROL EFFICIENCY
PTFE membrane baghouse	Dry particulate	99-99.9 %
HEPA filter and prefilter	Dry particulate	99.9-99.99 %
Wet packed scrubber	Aerosols	90-98 %

### **Polytetrafluoroethylene Membrane Baghouse**

Baghouses remove particulate matter from gas streams in the same manner as a household vacuum cleaner bag, using the principle of aerodynamic capture by fibers. In lieu of conventional natural or synthetic bag fabrics such as cotton or Nomex, polytetrafluoroethylene (PTFE, trade name Gore-Tex) fabric consists of a very thin laminate of microporous Teflon on a suitable substrate. PTFE bags are capable of a particulate collection efficiency of 99 to 99.9 percent for particle sizes down to 1.0 micron ( $\mu\text{m}$ ) when properly operated and maintained. Because of the microporous nature of PTFE, air-to-cloth ratios for these applications are lower than with conventional fabrics, requiring more collector area for a given volume flow rate of gas at a higher relative pressure drop. PTFE can tolerate moderately high temperatures (400°F) at the expense of shortened bag life. The current trend in bag cleaning is the pulsejet technology, where tubular bags are supported from the inside by metal wire frames. Gas flows across the fabric from the outside inward, exiting at the top of the bags. Periodically, a blast of compressed air from a fixed nozzle located inside the wire frame causes the bag to inflate outward, thus knocking the accumulated toxics-bearing dust off the bag exterior and into the baghouse hopper, ready for collection and disposal as dry potentially hazardous solid waste.

### **High-efficiency Particulate Arrestors (HEPA) Filters**

Used in conjunction with a baghouse or cartridge filter as a prefilter, high-efficiency particulate arrestors (HEPA) filters can trap toxic particles as small as 0.1  $\mu\text{m}$  at an efficiency of 99.99 percent or greater. Like cartridge filters, HEPA filter elements are of pleated construction. Air-to-cloth ratios for HEPA filters are low due to high media density, low porosity, and resulting high-pressure drop. HEPA filters are generally limited to ambient temperature (100°F), though special applications for higher temperatures are available. Unlike bags or cartridge filters, HEPA filters are not automatically cleaned. When a HEPA filter element becomes loaded with particulate matter, the element is changed out and disposed of as dry solid waste (possibly hazardous).

### **Wet Packed Scrubber**

The standard air pollution control system for electroplating and anodizing, these devices consist of a vertical column made of fiberglass or other non-corrosive material loosely filled with specially shaped plastic packing material which maximizes gas-to-liquid contact and minimizes pressure drop across the column. Exhaust air from a plating or anodizing tank line enters at the bottom of the scrubber and exits at the top. The scrubbing solution is pumped from a reservoir at the base of the scrubber and sprayed down into the packing from the top. This flow scheme is called counter-current scrubbing and is the dominant method in use today due to its high pollutant removal efficiency, ranging from 90 to 98 percent, depending on residence (contact) time and solution freshness.

Wet packed scrubbers typically use a caustic solution (dilute sodium hydroxide) for absorbing acid mists. For absorbing caustic mists, acid solutions (dilute sulfuric acid) are typically employed. Scrubber solutions are maintained at the proper pH by automatic addition of concentrated sodium hydroxide or sulfuric acid solutions to scrubber make-up water, whichever is applicable. Usually, just slightly acidic or basic conditions are maintained with pH in the 5 to 6 range for acid solutions or 8 to 9 range for caustic solutions. As the scrubber solution becomes loaded with absorbed air contaminants, including trace metals and salts resulting from neutralization reactions, scrubber efficiency is diminished and the risk of clogging the packing increases. Therefore, scrubber solutions must be refreshed by either continuously draining off a small flow of solution and replacing it with fresh water and reagent (the engineering term for this is "blowdown") or by periodically replacing the entire contents of the scrubber solution reservoir. In either case, a liquid/sludge waste stream containing metals and salts is generated. With continuous blowdown, the liquid effluent may need on-site pretreatment prior to discharge into municipal sewers to remove heavy metals. With periodic change out, the spent solutions may need to be disposed of as liquid hazardous waste.

### **Control Technology for Toxic T-VOC and Combined Controls for T-HOC**

Table 1-2 summarizes feasible air pollution control technologies for T-VOC and T-HOC. These control techniques are characterized by moderate to high-energy requirements in most applications. Pressure drops can range from very low (afterburners) to very high (carbon adsorption), with corresponding energy requirements. In general, high destruction removal efficiency (DRE) controls are also high-energy controls with correspondingly high operating costs.

Table 1-2 Controls for T-VOC and T-HOC

CONTROL TECHNOLOGY	SUBSTANCE GROUP	CONTROL EFFICIENCY
<b>Combined Controls:</b>		
Regenerative thermal oxidizer with dry scrubber and PTFE membrane baghouse	Halogenated T-VOC (high concentration)	99.9 - 99.99 %
Moving bed carbon adsorption concentrator with regenerative thermal oxidizer, dry scrubber and PTFE membrane baghouse	Halogenated T-VOC (high concentration)	90 - 99 %
<b>Carbon Absorption Controls:</b>		
Fixed bed with regenerative solvent reclaimer	T-VOC Halogenated T-VOC	50-99 %
Moving bed with regenerative solvent reclaimer	T-VOC Halogenated T-VOC	50-99 %
Moving bed with regenerative thermal oxidizer	T-VOC	50-99 %
Fluidized bed with regenerative thermal oxidizer	T-VOC	50-99 %
Fixed bed disposable	T-VOC Halogenated T-VOC	50-99 %
<b>Chemical Adsorption Controls:</b>		
Acid solution Packed column Plate column	Ethylene oxide (EtO) Caustics	90-98 %
Caustic solution Packed column Plate column	Acid Gases	90-98 %
Water solution Packed column Plate column	Polar/soluble/miscible	90-98 %
Solvent solution Packed column Plate column	Soluble T-VOC	90-98 %
<b>Condensation Controls:</b>		
Refrigerated surface condenser	T-VOC	50-95 %

## **Oxidation**

Oxidation is the process of converting VOC gases to carbon dioxide and water through combustion. Of the various types of oxidizers available, the two basic types of equipment used most often are thermal oxidizers and catalytic oxidizers (Table 1-3). Thermal oxidizers rely on direct contact between toxic gases and high-temperature flames to disassociate and destroy toxic substances. Catalytic oxidizers rely on an active catalyst bed at moderate temperatures to break intramolecular bonds, also causing disassociation and destruction of toxic substances.

**Table 1-3 Thermal and Catalytic Controls for T-VOC**

<b>CONTROL TECHNOLOGY</b>	<b>SUBSTANCE GROUP</b>	<b>CONTROL EFFICIENCY</b>
Direct flame afterburner 1,200 - 1,400 °F, t > 0.3 sec*	T-VOC EtO	95-98 %
Recuperative heat exchanger oxidizer 1,400 - 1,600 °F, t > 0.5 sec	T-VOC	98-99 %
Regenerative heat exchanger oxidizer 1,800 - 2,000 °F, t > 0.8 sec	T-VOC	99-99.9 %
Catalytic oxidizer 700 - 800 °F, t > 0.1 sec	T-VOC EtO	90-95 %

### ***Thermal Oxidizers***

There are three main categories of thermal oxidizers that could be used to control T-VOCs: afterburners with no heat recovery, thermal oxidizers with recuperative heat recovery and highly efficient regenerative heat recovery oxidizers. When thermal oxidizers are used to destroy halogenated organic compounds, special materials or construction are often required, such as fiber-reinforced plastic (FRP) or stainless steel. In addition, a downstream scrubber is frequently needed to minimize releases of halogenated acid gases. The extent and type of these additional items depend upon the level of the halogenated compounds in the inlet stream and applicable regulatory requirements. The following paragraphs briefly describe the three types of thermal oxidizers.

**Afterburners:** Afterburners are most commonly used to control intermittent and emergency releases of T-VOCs. Due to factors such as noise and the lack of heat recovery, (which results in high energy consumption and high NO<sub>x</sub>, CO, and CO<sub>2</sub> emissions) their use for steady-state control of VOCs is not widespread. They are most often used for controlling intermittent releases of ethylene oxide from medical or food product sterilizers. Afterburners operate in the 1,200 °F to 1,400 °F range with a residence time of at least 0.3 seconds and destruction removal efficiency of 95 to 98 percent.

Both recuperative and/or regenerative thermal oxidation systems generally consist of a refractory-lined chamber, one or more burners, a temperature-control system and heat-recovery equipment. Contaminated gases are collected by an industrial ventilation system and delivered to the preheater inlet, where they are heated by indirect contact with the hot oxidizer exhaust. Gases are then mixed thoroughly with the burner flame in the upstream portion of

the unit, and then pass through the combustion zone where the combustion process is completed. The T-VOC concentrations in most industrial process vent-streams are too low for self-sustaining combustion. Therefore, a supplemental fuel (natural gas) is required. Depending on the heat recovery efficiency, this supplemental fuel requirement may or may not translate into significant annual operating costs.

**Recuperative thermal oxidizers:** Recuperative thermal oxidizers recover 60 to 80 percent of the system's energy demands with a shell and tube type heat exchanger. Recuperative units operate in the 1,400°F to 1,600°F range with a residence time of at least 0.5 seconds and DREs of 98 to 99 percent. Thermal oxidizers with recuperative heat exchangers can recover 80 to 95 percent of the energy requirement. These recuperative thermal oxidizers use a ceramic medium for heat transfer, which is stored in three or more dedicated beds that feed a central combustion chamber. Valves control which bed is being preheated by exhaust gases and which bed is transferring its heat to incoming T-VOC contaminated air.

**Regenerative thermal oxidizers:** Regenerative units operate in the 1,800 °F to 2,000 °F range with a residence time of at least 0.8 seconds and DREs of 99 to 99.9 percent. Regenerative oxidizers cost more than recuperative designs of equal capacity. However, their life-cycle costs are less because annual fuel costs are less than for recuperative units.

### *Catalytic oxidizers*

Catalytic oxidation is similar to thermal oxidation in that heat is used to convert the T-VOC contaminants to carbon dioxide and water. However, a catalyst is used to lower the oxidation activation energy, allowing combustion to occur at 600°F to 800°F, significantly lower temperatures than those of thermal units. In catalytic oxidation, the preheated gas stream is passed through a catalyst bed, where the catalyst initiates and promotes the oxidation of the T-VOC without being permanently altered itself. Catalyst units have a residence time of at least 0.1 seconds and DREs of 90 to 95 percent. The primary advantage of catalytic oxidation over thermal oxidation is lower fuel cost, depending on the efficiency of the air preheater. Disadvantages include higher capital costs, periodic catalyst replacement, and the inability to handle halogenated organics.

The most common catalyst configuration is the plate-and-frame arrangement, in which blocks of catalyst material are held in place within the oxidizer body by a metal frame. The catalyst consists of a reactive material (such as platinum, platinum alloys, copper chromite, copper oxide, chromium, manganese or nickel) on an inert substrate (such as honeycomb-shaped ceramic). For the catalyst to be effective, the reactive sites upon which the T-VOC gas molecules react must be accessible. The build-up of polymerized material or reaction with certain metal particulates will prevent contact between reactive sites and the exhaust gas. A catalyst can be reactivated by removing such a coating. Cleaning methods vary with the type of catalyst and include air blowing, steam blowing and operating at elevated temperatures (100°F above the operating temperature) in a clean air stream. As with other catalytic processes, oxidation catalyst material can be lost by erosion, attrition, and vaporization at high temperatures.

## **Carbon Adsorption**

Adsorption is a process by which T-VOCs are retained on the surface of granular solids. The solid adsorbent particles are highly porous and have very large surface-to-volume ratios. Gas molecules penetrate the pores of the adsorbent and contact the large surface area available for adsorption.

Materials such as activated carbon, silica gel, or alumina may be used as adsorbents. Activated carbon is the most common adsorbent for T-VOC removal. Carbon may also be used to remove other compounds such as sulfur-bearing or odorous materials. Advantages of carbon adsorption include the recovery of a relatively pure product for recycle and reuse and a high removal efficiency with low inlet concentrations. In addition, if a process stream is already available onsite, additional fuel costs are low, the main energy requirement being electrical power to run fan motors. Disadvantages are the potential generation of a hazardous organic waste if the recovered product cannot be reused, the generation of potentially contaminated wastewater that must be treated (when regeneration is by steam), and potentially higher operating and maintenance costs for the disposal of these two waste streams.

Fixed, moving, or fluidized-bed regenerative carbon adsorption systems operate in two modes, adsorption and desorption. Adsorption is rapid and removes from 50 to 99 percent of T-VOCs in the air stream, depending on their composition, concentration, temperature, and bed characteristics. Well-designed and operated systems, however, can usually achieve removal efficiencies in the 90 to 99 percent range. Eventually, the adsorbent becomes saturated with the vapors and system efficiency drops. At this point (called "breakthrough," since the contaminants "break through" the saturated bed), the T-VOC contaminated stream is directed to another bed containing regenerated adsorbent, and the saturated bed is then regenerated. Although it is possible to operate a nonregenerative adsorption system (i.e., the saturated carbon is disposed of and fresh carbon is placed into the bed), most applications, especially those with high VOC loadings, are regenerative.

The adsorption/regeneration cycle can last from a few hours to many days, depending on the inlet T-VOC concentration, the variability of T-VOC loading and the design parameters of the carbon bed (e.g., the amount of carbon and the bed's depth). Saturated carbon beds can be regenerated with steam, hot air, or a combination of vacuum and hot gas. Although the bed can be regenerated, complete desorption is not possible, and a small amount of T-VOC (called a "heel") will remain on the bed after each regeneration. After time, the bed can no longer be used and must be replenished with fresh carbon. Carbon life of five years is typical. The concentrated T-VOCs in the regeneration stream must be reclaimed (decanted or distilled), destroyed (oxidized), or otherwise disposed of in an environmentally sound manner.

An important consideration in the design of a carbon adsorption system is the temperature of the gas stream. Adsorption capacity of the carbon, and thus the performance of the adsorber, are directly related to this temperature -- adsorption capacity decreases with increasing temperature. Operating temperature must be less than 100°F. Otherwise, the gas will have to be cooled in a heat exchanger prior to being passed through the absorber. Also, the relative humidity of the gas stream can affect the operating capacity of the carbon, and should not exceed 50 percent. Entrained liquid and particulate matter can also cause operating problems, such as plugging, and should be removed by mist eliminators or a packed filter upstream of the absorber. In addition, T-VOCs with boiling points above 300°F (such as phenol) will be

collected by the carbon, but will not be removed during regeneration of the bed. These compounds should be removed upstream of the absorber inlet or captured on a sacrificial bed in the absorber.

Equipment has been developed that combines moving-bed activated carbon adsorption with thermal or catalytic oxidation. T-VOCs are collected by rotating-wheel carbon beds and subsequently desorbed with hot air. The concentrated exhaust stream is then sent to a thermal or catalytic oxidizer, where the T-VOC is combusted. The benefit of this configuration is that the volume of the desorption air stream is as much as fifteen times less than the original T-VOC stream, which translates into a smaller and less expensive oxidizer. Fuel costs are also lower than for a full-sized oxidizer for the same application. This approach is particularly useful for T-VOC streams with low concentrations and high volumes [concentrations less than 100 ppm and flow rates over 10,000 cubic feet per meter (CFM)], such as paint spray booths. Combination systems provide the inherent advantages of the individual techniques - the high destruction efficiency and no generation of liquid or solid waste of oxidation, and the low fuel consumption and good control efficiency of adsorption - without many of the disadvantages of each system. The ability of combination units to concentrate the T-VOC emission stream and thus lower the flow rate requiring oxidation not only minimizes the capital costs associated with the oxidizer, but also maximizes the energy input derived by combusting the T-VOC. In addition, by eliminating the steam for regeneration (and the subsequent condensate), the system does not generate contaminated wastewater.

### **Chemical Absorption or Wet Scrubbing**

Absorption is the mass transfer of selected components from a gas stream into a nonvolatile liquid. Such systems are typically classified by the absorbent used (water or organic liquid, such as mineral oil or low-volatility hydrocarbon solvent). The choice of absorbent depends on the solubility of the gaseous T-VOC compounds and the cost of the absorbent. Absorption will occur when the concentration of the organic species in the liquid phase is less than the equilibrium concentration of the gaseous component. The gradient between the actual and the equilibrium concentrations is the driving force. Absorption is a function of both the physical properties of the system and the operating parameters of the absorber. The best absorption systems are characterized by low operating temperatures, large contacting surface areas, high liquid-to-gas (L/G) ratios and high T-VOC concentrations in the gas stream. Removal efficiencies in the 90 to 98 percent range may be achieved for well-designed and operated systems. Absorption is also efficient for dilute streams provided the T-VOC is highly soluble in the absorbent. Packed columns and plate columns are commonly used for high-efficiency pollution control applications.

The efficiency of absorption as a VOC control technique depends on several factors: the solubility of the T-VOC in the solvent; the concentration of the T-VOC in the gas stream; temperature; the L/G ratio; and the contact surface area. Higher gas solubilities and inlet concentrations provide a larger driving force for more efficient absorption. Since lower temperatures correspond to higher gas solubilities, absorption is also enhanced at reduced temperatures. The solvent flow rate is determined from the minimum L/G ratio, which can be found from material balances and equilibrium data. Generally, the most economical absorption factor is 1.25 to 2 times the minimum L/G. Absorption efficiency increases with contact surface area. Increasing the surface area, however, also raises the pressure drop through the packed bed. Thus, while a larger contact surface area may increase the overall removal efficiency, the higher energy consumption (fan power) may make it uneconomical.

Two modes of operation are typical for absorption systems: simple absorption and complex absorption. Simple absorption uses a single liquid pass system, where the T-VOC contaminated liquid is disposed of directly after exiting the absorber. In complex absorption, the T-VOC contaminant is recovered via stripping or other desorption techniques and the cleaned absorbent is recycled to the absorber. This option is generally feasible for organic-based systems employing expensive absorbents. In either case, waste streams are generated. In simple absorption systems where the absorbent is water, dilute acids, or dilute caustics, the spent solution, called "blowdown," is continuously bled off and replenished with fresh reagent. Typical blowdown rates are one to 10 percent of the solution recirculation rate, depending on the concentration of T-VOC air contaminants being absorbed. In complex absorption systems, a concentrated T-VOC stream is generated and must be reclaimed, destroyed, or otherwise disposed of in an environmentally sound manner.

## **CHAPTER 2**

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**Introduction**

**General Information**

**Environmental Factors Potentially Affected**

**Determination**

**Discussion and Evaluation of Environmental Checklist**

## **INTRODUCTION**

The environmental checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the proposed project.

## **GENERAL INFORMATION**

Project Title:	Proposed Amended Rules 307.1, 1401, and 1402 and Associated <del>PAR</del> Rule 1402 Guidance Documents
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive, Diamond Bar, CA 91765
Rule Contact Person:	Uyen-Uyen Vo, (909) 396-2238
CEQA Contact Person:	Cynthia Carter, (909) 396-2431
Project Sponsor's Name:	South Coast Air Quality Management District
Project Sponsor's Address:	21865 Copley Drive, Diamond Bar, CA 91765
General Plan Designation:	Not applicable
Zoning:	Not applicable
Description of Project:	<u>PAR 1402 includes a voluntary program to allow facilities to use an alternative public notification approach if they implement early measures that reduce facility health risks at least 60% below Rule 1402 Action Risk Levels. Facilities that do not use this voluntary program would still be subject to the traditional regulatory approach to reduce risks and notify the public if health risks exceed Rule 1402 thresholds. In addition, PAR 1402 streamlines implementation, includes provisions for potentially high risk facilities, and includes other amendments to improve clarity of the rule. PAR 307.1 includes a fee category for Voluntary Risk Reduction facilities, a provision that requires the facility owner or operator to directly pay or reimburse SCAQMD for costs associated with public meetings, and other administrative changes. Additionally, PARs 1401 and 1402 will revise reporting requirements regarding new or revised toxic air contaminant health values and the potential impacts to permitting and AB 2588, which will be included in the AB 2588 Annual Report. Lastly, one existing procedural guidelines document is being revised and a new procedural guidelines document is being developed. The SCAQMD AB2588 Public Notification Procedures document “Public Notification Procedures for Phase I and II Facilities Under Air Toxics ‘Hot Spots’ Information and Assessment Act of 1987 (AB 2588)” is being revised to clarify PAR 1402 notification requirements and a “Draft SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk Reduction Program” is being developed to establish PAR 1402</u>

Voluntary Risk Reduction procedures. The analysis concluded that the environmental impacts would be less than significant. PAR 1402 could affect eleven facilities that are on lists of California Department of Toxics Substances Control hazardous waste facilities per Government Code §65962.5 (<http://www.envirostor.dtsc.ca.gov/public>). Not applicable

Surrounding Land Uses and Setting: Not applicable

Other Public Agencies Whose Approval is Required: Not applicable

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The following environmental impact issues have been assessed to determine their potential to be affected by the proposed project. As indicated by the checklist on the following pages, environmental topics marked with an "✓" may be adversely affected by the proposed project. An explanation relative to the determination of the significance of the impacts can be found following the checklist for each area.

- |  |   |  |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics                               | <input checked="" type="checkbox"/> Geology and Soils               | <input type="checkbox"/> Population and Housing            |
| <input type="checkbox"/> Agriculture and Forestry Resources                  | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Public Services        |
| <input checked="" type="checkbox"/> Air Quality and Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hydrology and Water Quality     | <input type="checkbox"/> Recreation                        |
| <input type="checkbox"/> Biological Resources                                | <input type="checkbox"/> Land Use and Planning                      | <input checked="" type="checkbox"/> Solid/Hazardous Waste  |
| <input type="checkbox"/> Cultural Resources                                  | <input type="checkbox"/> Mineral Resources                          | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input checked="" type="checkbox"/> Energy                                   | <input checked="" type="checkbox"/> Noise                           | <input checked="" type="checkbox"/> Mandatory Findings     |

**DETERMINATION**

On the basis of this initial evaluation:

- I find PARs 1401, 1402 and the associated PAR 1402 guidance documents, in accordance with those findings made pursuant to CEQA Guideline §15252, COULD NOT have a significant effect on the environment, and that an ENVIRONMENTAL ASSESSMENT with no significant impacts has been prepared. Pursuant to CEQA Guidelines §15002(k)(1), 15061, and 15273, PAR 307.1 is determined to be exempt from CEQA requirements.
- I find that although PARs 1401, 1402 and the associated PAR 1402 guidance documents could have a significant effect on the environment, there will NOT be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. An ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- I find that PARs 1401, 1402 and the associated PAR 1402 guidance documents MAY have a significant effect(s) on the environment, and an ENVIRONMENTAL ASSESSMENT will be prepared.
- I find that PARs 1401, 1402 and the associated PAR 1402 guidance documents MAY have a "potentially significant impact" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL ASSESSMENT is required, but it must analyze only the effects that remain to be addressed.
- I find that although PARs 1401, 1402 and the associated PAR 1402 guidance documents could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL ASSESSMENT pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL ASSESSMENT, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

**Date:** August 17, 2016

**Signature:**



Jillian Wong, Ph.D.  
Planning and Rules Manager  
Planning, Rules, and Area Sources

## **DISCUSSION AND EVALUATION OF ENVIRONMENTAL IMPACTS**

This ~~Final~~ Draft EA evaluated potential adverse environmental impacts that could potentially occur from additional air pollution control equipment needed as a result of implementing PAR 1402 and the Voluntary Risk Reduction program for facilities under the AB 2588 Hot Spots program. There are no expected environmental impacts resulting from amendments to Rule 1401 and the associated PAR 1402 guidance documents because the changes are administrative in nature and do not require or cause a physical change to the environment. This analysis assumes that there would be 33 new or modified permit applications and about 24 AB 2588 facilities that could potentially be affected and may require additional pollution control equipment. Potential adverse environmental impacts can occur from the construction and operation of air pollution control equipment. The environmental impact analysis for each environmental topic incorporates a “worst-case” approach. A discussion of the assumptions and basis for the number of facilities that could potentially require additional APCDs is discussed below.

### ***PAR 307.1 Analysis***

SCAQMD staff has reviewed PAR 307.1, pursuant to CEQA Guidelines §15002(k)(1) – Three Step Process, and CEQA Guidelines §15061 – Review for Exemption, and has determined that PAR 307.1 is exempt from CEQA for the following reasons. The proposed amendments to Rule 307.1 are strictly administrative in nature, consisting of including a fee for Voluntary Risk Reduction facilities and a provision to either directly pay or reimburse the SCAQMD for costs associated with public meetings required by Rule 1402 when a facility is required to provide public notification. PAR 307.1 has been updated to reference North American Industry Classification System (NAICS) codes instead of Standard Industrial Classification (SIC) codes and the most current version of associated documents. Because these amendments are strictly administrative in nature, it can be seen with certainty that there is no possibility that the proposed project may have a significant adverse effect on the environment. Additionally, PAR 307.1 is statutorily exempt from CEQA requirements pursuant to State CEQA Guidelines §15273 – Rates, Tolls, Fares, and Charges. Therefore, PAR 307.1 will not be discussed any further in this analysis.

### ***PAR 1401 Analysis***

Currently, Rule 1401 includes provisions for analyzing and reporting potential permitting impacts to the Governing Board when OEHHA revises health values for new and existing toxic air contaminants. Consistent with PAR 1402, PAR 1401 will remove these provisions and include this analysis in the AB 2588 annual report to streamline implementation. PAR 1401 removes the requirement for staff to report to the Governing Board regarding OEHHA changes to risk values. Staff will continue to analyze impacts to permitting and AB 2588 when TACs are added or revised and report these changes in the SCAQMD AB 2588 Annual Report. The AB 2588 Annual Report will include an impact assessment that evaluates the change in risk values. The proposed amendments for Rule 1401 align state timelines with District timelines for implementing updated toxicity factors and are administrative in nature, and therefore, will not have any direct or indirect physical environmental impact and will not be discussed any further in this analysis.

### ***PAR 1402 Analysis***

AB 2588 is the state-required Air Toxics Hot Spots Program required by Health and Safety Code §44360(b)(2) which is implemented in the SCAQMD through Rule 1402. Under the AB 2588 program, facilities are divided into four implementation groups (Phase 1A, 1B, 2, and 3). During the “quadrennial” review, AB 2588 facilities are required to submit a more detailed emissions inventory for 177 toxic air contaminants. During the three years between the quadrennial review

AB 2588 facilities submit a toxics inventory for 23 toxic air contaminants under the existing SCAQMD Annual Emissions Reporting fee program. Based on the quadrennial toxics emissions inventory, SCAQMD staff prioritizes facilities and sends a letter to those facilities with a Priority Score in the highest category to submit an even more detailed air toxics emissions inventory and HRA. Implementing the AB 2588 program using the quadrennial review approach provides a more even workflow and reduces the impact on affected facilities to provide a detailed emissions inventory. Consistent with the quadrennial cycle in AB 2588, SCAQMD staff is estimating permitting impacts over a four year period. Construction of new facilities beyond the four years scope is considered speculative according to CEQA Guidelines §15145 and will not be evaluated further in this analysis.

#### ***PAR 1402 Guidance Documents Analysis***

Two supporting documents will also be presented to the Governing Board with PAR 1402 for the Governing Board's approval. The SCAQMD AB 2588 Public Notification Procedures document "Public Notification Procedures for Phase I and II Facilities Under Air Toxics 'Hot Spots' Information and Assessment Act of 1987 (AB 2588)"<sup>2</sup> is being revised to clarify PAR 1402 notification requirements that are specified in PAR 1402. This document is also being renamed to "SCAQMD Public Notification Procedures for Facilities Under the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) and Rule 1402". and a New "SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk Reduction Program" has been developed to establish and implement PAR 1402 Voluntary Risk Reduction procedures.

There are no expected environmental impacts from PAR 1401 and the associated PAR 1402 guidance documents because changes to these rules and guidance documents are administrative in nature and do not require or cause any physical damage to the environment

#### ***PAR 1402 Voluntary Risk Reduction Program***

With the proposed Voluntary Risk Reduction program, a total of 24 facilities have been identified as eligible facilities to participate in the program. A detailed discussion of these facilities and the impact analysis approach is as follows:

To qualify for the Voluntary Risk Reduction Program, facilities must have a Priority Score greater than 10 and a cancer risk greater than 10 in a million or a non-cancer hazard index greater than 1.0, or an offsite lead concentration greater than the National Ambient Air Quality Standard (NAAQS) or applicable lead limit in an SCAQMD rule (e.g., Rule 1420.1). The facilities that could utilize this program would be Action Risk Level Facilities (e.g., cancer risk  $\geq 25$  in a million) and Public Notice Risk Level (e.g., cancer risk  $\geq 10$ ) Facilities.

Based on previously approved HRAs, SCAQMD staff estimates that approximately 11 facilities have the potential to have a cancer risk greater than the Action Risk Level when using the Revised OEHHA Guidelines and would be eligible to participate in the Voluntary Risk Reduction Program. However, only 3 of the 11 facilities will require additional control equipment beyond that identified in the March 2015 Staff Report. Additionally, there are 21 other facilities that are in the AB 2588 program that have a cancer risk greater than the Public Notification Risk Level and may volunteer to do a Risk Reduction Plan when using the Revised OEHHA Guidelines. Hence, these two groups of facilities could

consider participating in the Voluntary Risk Reduction program to implement controls to reduce health risks to below 10 in a million cancer risk.

There is a different group of 28 facilities that are categorized as Intermediate Priority and cancer risks may be less than 10 in a million. These facilities may be impacted when their quadrennial reports are due<sup>1</sup>. Some of these facilities are requesting to be allowed to participate in the Voluntary Risk Reduction program and staff is considering to allow these facilities in the program. It is anticipated that when these facilities submit their Voluntary Risk Reduction Plan, the facilities may pass the screening level through calculations, risk characterizations and/or risk reduction measures (i.e. source testing, process change, curtailment, etc.) and no further action will be needed. No environmental impacts are anticipated from these 28 facilities.

SCAQMD staff evaluated these facilities' primary and secondary toxic risk drivers. Since Rule 1402 establishes a "facility-wide" risk threshold, there are a variety of options which can be implemented, such as process changes, material changes, additional air pollution controls, and reduced throughput.

Table 2-1 summarizes the types of facilities, key toxic air contaminants that are contributing to the cancer risk, and the type of air pollution controls that could be implemented to reduce the cancer risk.

**Table 2-1 PAR 1402 Potential APCDs to Reduce Health Risks**

Facility Type	Key Toxic Driver	APCDs
Aerospace	Hexavalent chromium	HEPA/Scrubber
Aerospace	Hexavalent chromium	Scrubber
Electricity Generation	PAHs	Oxidation catalyst
Gasoline Pipeline	Gasoline vapor	Small thermal oxidizer
Gasoline Pipeline	Benzene and gasoline vapor	Small thermal oxidizer
Glass Manufacturer	Nickel	HEPA Filters
Hospital	Formaldehyde and PAHs	Two Oxidation Catalysts
Hospital	Ethylene oxide and formaldehyde	Scrubber
Metal Melting	Nickel	Two HEPAs/Scrubbers
Metal Melting	Hexavalent chromium and PAHs	Scrubber/Oxidation Catalyst
Metal Plating	Hexavalent chromium	HEPA Filters
Refinery	Hexavalent chromium	Scrubber

<sup>1</sup> Since the implementation of the Revised OEHHA Guidelines (June 2015), facilities are not prioritized until they report their quadrennial emissions.

Facility Type	Key Toxic Driver	APCDs
Refinery	Benzene	Oxidation catalyst
Refinery	Benzene and acrolein	Small thermal oxidizer
Refinery	Carbon tetrachloride and nickel	Carbon Adsorber
Roofing Supplies	Hydrogen sulfide	Scrubber
Ski Facility	Acrolein	Oxidation catalyst
University	PAHs and acrolein	Diesel particulate filters
Waste Management	Formaldehyde	Carbon Adsorber/ Oxidation Catalyst
Waste Management	Tetrachloroethylene	Carbon Adsorber
Waste Management	Formaldehyde	Carbon Adsorber
Waste Management	Hexavalent chromium and Benzene	HEPA Filters
Waste Management	Vinyl chloride and hydrochloric acid	Scrubber/Carbon Adsorber
Waste Management	chloroform	Scrubber/Carbon Adsorber

It is assumed that 24 facilities may elect to install additional air pollution controls due to the Voluntary Risk Reduction program. This is based on review of previously approved HRAs that have been received through implementation of the AB 2588 program. This is likely a conservative estimate (meaning there will not be more facilities) based on previously approved HRAs.

The review and approval process for the AB 2588 program is staggered, even for facilities within the same quadrennial review cycle. SCAQMD staff is estimating that of the 24 identified AB 2588 facilities (among the entire 4-year cycle), a conservative estimate would be to assume a maximum of three facilities would be installing equipment on a given day.

The 24 affected facilities could potentially be installing and operating 33 pieces of control equipment. A summary of the types of pollution controls from Rule 1402 are provided in Table 2-2 below.

**Table 2-2 Summary of Types of APCD’s to be Installed at Estimated Affected Facilities and Analyzed for Impacts**

	<b>HEPA Filters</b>	<b>Oxidation Catalysts</b>	<b>Carbon Adsorber</b>	<b>Wet Scrubbers</b>	<b>Thermal Oxidizers</b>	<b>Total</b>
<b>PAR 1402 Impacts (# of APCDs)</b>	6	8	6	10	3	33
<b>Environmental Topics to be Analyzed</b>	<ul style="list-style-type: none"> <li>• Aesthetics</li> <li>• AQ</li> <li>• Solid waste</li> </ul>	<ul style="list-style-type: none"> <li>• Aesthetics</li> <li>• AQ</li> <li>• Solid waste</li> </ul>	<ul style="list-style-type: none"> <li>• Aesthetics</li> <li>• AQ</li> <li>• Energy</li> </ul>	<ul style="list-style-type: none"> <li>• Aesthetics</li> <li>• AQ</li> <li>• Energy</li> <li>• Hydrology</li> <li>• Solid/Hazardous waste</li> </ul>	<ul style="list-style-type: none"> <li>• Aesthetics</li> <li>• AQ</li> <li>• Energy</li> </ul>	

## ENVIRONMENTAL CHECKLIST AND DISCUSSION

### I. AESTHETICS.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### SIGNIFICANCE CRITERIA

The proposed project impacts on aesthetics will be considered significant if:

- The project will block views from a scenic highway or corridor.
- The project will adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

### DISCUSSION

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~PAR~~Rule 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**I. a), b), d) No Impact.** In general, the proposed amended rules have no potential to affect scenic vistas because installation of APCDs (i.e. HEPA filters, Thermal Oxidizers, Oxidation Catalysts, Wet Scrubbers, and Carbon Adsorbers) will occur at existing commercial, industrial, or institutional facilities. Likewise, additional light or glare would not be created since no additional light generating equipment would be required for implementation of PAR 1402. Equipment used to control TAC emissions is typically located inside buildings which are located in industrial/commercial areas.

**I. c) Less than Significant Impact.** There will be additional pieces of industrial APCDs (i.e. HEPA filters, Thermal Oxidizers, Oxidation Catalysts, Wet Scrubbers, and Carbon Adsorbers), but the facilities will be installing in an existing commercial, industrial setting with commercial,

industrial and institutional equipment so not likely to change the usual character or quality of the site and its surroundings. Therefore, impacts are considered less than significant.

Based upon these considerations, significant aesthetic impacts are not expected from implementing PAR 1402. Since no significant aesthetic impacts were identified for any of the issues, no mitigation measures are necessary or required.

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**II. AGRICULTURE AND FORESTRY RESOURCES.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Project-related impacts on agriculture and forest resources will be considered significant if any of the following conditions are met:

- The proposed project conflicts with existing zoning or agricultural use or Williamson Act contracts.
- The proposed project will convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use.
- The proposed project conflicts with existing zoning for, or causes rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code § 51104 (g)).
- The proposed project would involve changes in the existing environment, which due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated PAR 1402 guidance documents, since

they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**II. a), b), c), & d) No Impact.** Land use, including agriculture- and forest-related uses, and other planning considerations are determined by local governments. While implementation of PAR 1402 may cause APCDs to be installed and operated on existing equipment to control toxic emissions, these activities will occur at established toxic emitting facilities which are located on previously developed land in primarily industrial areas and are not located on agricultural or forest areas.

Further, no new construction of buildings or other structures is expected that would require conversion of farmland to non-agricultural use or conflict with zoning for agricultural uses or a Williamson Act contract. Further, because PAR 1402 does not require construction or operation activities within an area designated as forest land, implementation of PAR 1402 is not expected to conflict with any forest land zoning codes or convert forest land to non-forest uses. Similarly, there is nothing in PAR 1402 that would affect or conflict with existing land use plans, policies, or regulations or require conversion of farmland to non-agricultural uses or forest land to non-forest uses. Thus, no agricultural land use or planning requirements will be altered by PAR 1402.

Finally, the installation of toxic emission control equipment will ensure that projected toxic emission reductions will occur and that air quality in the region will improve. Thus, assuring that these air quality improvements occur could provide benefits to agricultural and forest land resources by reducing the adverse oxidation impacts of ozone on plants and animals located in the Basin.

Based upon these considerations, significant agricultural and forest resources impacts are not expected from implementing PAR 1402. Since no significant agriculture and forest resources impacts were identified for any of the issues, no mitigation measures are necessary or required.

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**III. AIR QUALITY AND GREENHOUSE GAS EMISSIONS**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria**

To determine whether or not air quality impacts from the proposed project may be significant, impacts will be evaluated and compared to the criteria in Table 2-3.

Table 2-3 SCAQMD Air Quality Significance Thresholds

<i>Mass Daily Thresholds<sup>a</sup></i>		
<b>Pollutant</b>	<b>Construction<sup>b</sup></b>	<b>Operation<sup>c</sup></b>
<b>NOx</b>	100 lbs/day	55 lbs/day
<b>VOC</b>	75 lbs/day	55 lbs/day
<b>PM10</b>	150 lbs/day	150 lbs/day
<b>PM2.5</b>	55 lbs/day	55 lbs/day
<b>SOx</b>	150 lbs/day	150 lbs/day
<b>CO</b>	550 lbs/day	550 lbs/day
<b>Lead</b>	3 lbs/day	3 lbs/day
<i>Toxic Air Contaminants (TACs), Odor, and GHG Thresholds</i>		
<b>TACs</b> (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk $\geq 10$ in 1 million Cancer Burden $> 0.5$ excess cancer cases (in areas $\geq 1$ in 1 million) Chronic & Acute Hazard Index $\geq 1.0$ (project increment)	
<b>Odor</b>	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
<b>GHG</b>	10,000 MT/yr CO <sub>2</sub> eq for industrial facilities	
<i>Ambient Air Quality Standards for Criteria Pollutants<sup>d</sup></i>		
<b>NO<sub>2</sub></b>  1-hour average annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
<b>PM10</b> 24-hour average annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>e</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
<b>PM2.5</b> 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>e</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
<b>SO<sub>2</sub></b> 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 <sup>th</sup> percentile) 0.04 ppm (state)	
<b>Sulfate</b> 24-hour average	25 $\mu\text{g}/\text{m}^3$ (state)	
<b>CO</b>  1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
<b>Lead</b>  30-day Average Rolling 3-month average	1.5 $\mu\text{g}/\text{m}^3$ (state) 0.15 $\mu\text{g}/\text{m}^3$ (federal)	

<sup>a</sup> Source: SCAQMD CEQA Handbook (SCAQMD, 1993)

<sup>b</sup> Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).

<sup>c</sup> For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.

<sup>d</sup> Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

<sup>e</sup> Ambient air quality threshold based on SCAQMD Rule 403.

KEY: lbs/day = pounds per day    ppm = parts per million     $\mu\text{g}/\text{m}^3$  = microgram per cubic meter     $\geq$  = greater than or equal to  
MT/yr CO<sub>2</sub>eq = metric tons per year of CO<sub>2</sub> equivalents     $>$  = greater than

## **DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~PAR~~Rule 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below. A summary of the type of pollution controls to be installed is provided in Table 2-2.

**III. a) No impact.** SCAQMD is required by law to prepare a comprehensive district-wide Air Quality Management Plan (AQMP) which includes strategies (e.g., control measures) to reduce emission levels to achieve and maintain state and federal ambient air quality standards, and to ensure that new sources of emissions are planned and operated to be consistent with SCAQMD’s air quality goals. The AQMP’s air pollution reduction strategies include control measures which target stationary, area, mobile and indirect sources. These control measures are based on feasible methods of attaining ambient air quality standards. Pursuant to the provisions of both the state and federal Clean Air Acts (CAA)s, SCAQMD is required to attain the state and federal ambient air quality standards for all criteria pollutants.

PAR 1401 and the associated ~~Rule~~PAR 1402 guidance documents are administrative in nature and have no impact on AQMP strategies. PAR 1402 is for facilities choosing to install APCDs for Voluntary Risk Reduction Program. This does not conflict with the AQMP because there are no control measures associated with these proposed amendments and controlling lead (a toxic) is considered an AQMP strategy. Therefore, these proposed amendments are consistent with the AQMP.

### *Toxic Air Contaminants: General Identification and Control Measures (AB 2728)*

AB 2728 was enacted in 1992 and amends the Tanner process (AB 1807) to reflect the shift of certain duties from the Department of Health Services (DHS) to the California Environmental Protection Agency (Cal/EPA) Office of Environmental Health Hazard Assessments (OEHHA). This law requires the ARB to identify all 188 hazardous air pollutants (HAPs) listed under Title III of the 1990 CAA Amendments as TACs under the AB 1807 process. It encourages local air districts to adopt TAC programs to enable local enforcement of Title III - Air Toxics of the federal CAA. AB 2728 further provides that districts may adopt more stringent requirements than those provided under AB 1807. Health & Safety Code 44300 et. Seq. sets forth the state’s Air Toxics “Hot Spots” Program (AB 2588), which requires districts to use OEHHA for risk assessment. H&S 44360(b)(2). PAR 1402 will be more stringent than what is required in the H&S Code.

PAR 1402 would reduce toxic emissions and therefore, be consistent with the goals of the AQMP, Additionally, the emissions associated with rule compliance for both construction and operation do not exceed the SCAQMD’s CEQA significance thresholds (see analysis in III.b and f). Therefore, implementing the proposed rule amendments do not conflict or obstruct implementation of the AQMP or federal CAA.

### III. b) and f) Less than significant impacts.

#### *Criteria Pollutants – Construction Impacts*

##### Affected Facilities

In order to estimate the number of future facilities affected by PAR 1402, as previously discussed at the beginning of this Chapter, SCAQMD staff evaluated AB 2588 facilities to determine which facilities may participate in the Voluntary Risk Reduction Program. The number of affected facilities and corresponding impacts to those facilities or operational activity of new or existing facilities were used as a surrogate to analyze possible impacts. Consistent with the quadrennial cycle in AB 2588, SCAQMD staff is estimating permitting impacts over a four year period. Construction of new facilities beyond the four years scope is considered speculative according to CEQA Guidelines §15145 and will not be evaluated further in this analysis.

Construction emissions were estimated for the various construction phases for the installation of APCDs. The phases are: grading/site preparation, paving, and equipment installation<sup>2</sup>. In addition, criteria pollutant emissions were calculated for all on-road vehicles transporting workers, vendors, and material removal and delivery. Since all phases must be entirely completed before the next phase can commence, there would be no overlap of construction phases for the construction of the new APCDs.

Any process substitutions or product reformulations are not expected to require installation of new equipment. Activities during construction that could potentially adversely affect air quality are those activities associated with the installation of APCDs.

The primary source of construction air quality impacts would be from those facilities installing larger size add-on controls (thermal oxidizers or scrubbers). The type of construction-related activities attributable to existing facilities that would be installing control equipment would consist predominantly of cutting, welding, etc. These construction activities would involve minor grading, slab pouring, or paving activities for the APCDs footprint. For the purposes of this analysis, construction activities undertaken at affected facilities are anticipated to entail the use of portable equipment (e.g., cranes, backhoes, etc.) and hand held equipment by small construction crews to weld, cut, and grind metal structures. Hence, all of PAR 1402 elements were considered in the daily construction emissions.

To analyze the “worst-case” emissions from construction activities associated with the implementation of the proposed amendments, SCAQMD staff assumed that three facilities would be installing APCDs at any given time at affected facilities to comply with the risk thresholds.

SCAQMD staff assumed that the maximum daily emissions from construction-related activities for each phase would all occur on the same day. Table 2-4 presents the results of the SCAQMD’s construction air quality analysis. Appendix B contains the spreadsheets with the results and assumptions used for this analysis.

It should be noted that the analysis of construction air quality impacts was a “worst-case” analysis because it assumes that the peak construction would occur from the facilities that had the largest APCDs to install in regards to footprint size (i.e. thermal oxidizer or scrubber). There are a number

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<sup>2</sup> In general, no or limited construction emissions from grading are anticipated because modifications or installation of new equipment would occur at existing industrial/commercial facilities and, therefore, would not be expected to require earthmoving, grading, etc.

of factors that would preclude concurrent construction activities including: engineering time necessary to plan and design the control equipment, permitting constraints, and type and size of control equipment to be constructed, etc. Furthermore, as a “worst-case,” the SCAQMD’s air quality impacts analysis assumes that peak construction activities could take up to two months to complete. Depending on the type and size of the control equipment to be constructed, actual construction time could be substantially less than two months. Further, some affected facilities could reduce emissions through methods other than installing control equipment, thus, eliminating construction impacts at those facilities. Construction emissions at any three facilities would not exceed any of the significance thresholds identified in Table 2-4. Finally, once construction is complete, construction air quality impacts would cease.

The peak daily emissions vary for each pollutant depending on the construction phase, which do not overlap in time (i.e. a site would need to be graded before paving and paved before installing). As mentioned before, this analysis assumes three facilities will be constructing at the same time for a worst case scenario. The significance determination for the construction is based on the peak daily emissions during any construction phase. Therefore, all of the construction impacts from the project are not significant for criteria pollutant emissions.

**Table 2-4 PARs Daily Peak Construction Emissions in SCAQMD for Three Facilities**

Construction Phase	CO, lb/day	NO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day
Grading/Site Preparation	34.3	75.7	<b>11.6</b>	<b>4.7</b>	8.2	0.1
Paving	22.6	35.9	2.2	2.0	0.7	0.0
Equipment Installation	<b>44.8</b>	<b>88.9</b>	4.3	3.9	<b>10.3</b>	<b>0.1</b>
Significance Threshold, lb/day	550	100	150	55	75	150
Exceed Significance?	No	No	No	No	No	No

#### ***Criteria Pollutants – Operation Impacts***

Five different types of add-on control equipment were identified to reduce toxic risk at the affected facilities. Two of the control devices, thermal oxidizers and carbon adsorbers, have the potential to generate adverse secondary air quality impacts during operation. (All other APCDs will reduce toxic emissions, but will not increase criteria pollutants.)

To analyze maximum air quality impacts, it was assumed that for each operation needing to incinerate, the add-on control equipment would be a thermal oxidizer because they generate the highest emissions compared to other types of oxidizers. Thermal oxidizers destroy T-VOC emissions, but the process produces secondary criteria pollutant emissions such as CO, NO<sub>x</sub>, VOC, SO<sub>x</sub>, and PM10. Carbon adsorbers possess a carbon bed that requires regeneration for reuse. Emissions are produced when the spent carbon is regenerated.

The operation of the control equipment will reduce toxic exposure and will assist in meeting the risk threshold. The direct and indirect criteria emissions for each control equipment are totaled, in Table 2-7 and are less than the SCAQMD's mass daily operational significance thresholds; therefore, the proposed amendments are not expected to result in significant adverse operational criteria pollutant emission impacts.

### **Air Quality Assumptions**

1. Affected facilities were assumed to operate the control equipment for twenty-four hours per day, seven days per week, and 52 weeks per year. These parameters represent a "worst-case" scenario, especially for the thermal oxidizer users because it overestimates the typical hours of high-fired load operation. For example, during some hours of operation incinerators operate on low-fired load when T-VOC emissions are not being vented to the combustion chamber, which results in lower combustion emissions from the thermal oxidizer. Additionally, not taken into consideration is the fact that hybrid technology has emerged that allows more efficient use of thermal oxidizers.
2. Affected facilities are medium- to large-sized, therefore, the exhaust emission flowrate (in cubic feet per minute, cfm) was estimated to be at 10,000 cubic feet per minute (cfm) for all APCDs.

### **Thermal Oxidizers**

To estimate criteria pollutant emissions from thermal oxidizers, general default emission factors were used. Currently, SCAQMD permitting staff requires thermal oxidizers less than two million British thermal units (MMbtu) per hour to comply with a NO<sub>x</sub> concentration of 30 parts per million as BACT. This translates to an emission factor of 36 pounds per million cubic feet (MMcf) of natural gas used as the combustion fuel. The actual emission factors were derived from the Annual Emissions Reporting (AER) default emission factor of 130 pounds per MMcf<sup>3</sup>. For CO, T-VOC, PM<sub>10</sub>, and SO<sub>x</sub>, SCAQMD permitting staff uses the general AER default emission factors for all sizes of thermal oxidizers.

As shown in Table 2-2, three thermal oxidizers were identified as likely to be needed for reducing risks. To calculate the daily emissions, the number of devices is multiplied by the assumed operating schedule and the amount of natural gas consumed, and then divided by the heating value of natural gas. The result is multiplied by the criteria pollutant emission factor to determine the pounds per day of emissions. At 10,000 cfm, the amount of natural gas consumed by a thermal oxidizer is 0.488 MMBTU per hour. The heating value of natural gas is 1,050 MMBTU/MMcf.

$$(3 \text{ Thermal Oxidizers} \times 24 \text{ hrs/day} \times 0.488 \text{ MMBTU/hr}) / (1050 \text{ MMBTU/MMcf}) = 0.03 \text{ MMcf/day}$$

Table 2-5 shows total criteria pollutant emissions generated by the facilities anticipated to install thermal oxidizers to reduce TAC emissions.

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<sup>3</sup> SCAQMD AER Help and Support Manual, Criteria Pollutant Factors:  
<http://www3.aqmd.gov/webappl/help/newaer/index.html>

**Table 2-5 Estimated Operational Emissions from Three Thermal Oxidizers**

Criteria Pollutant	Emission Factor (lb/MMcf)	MMcf/day	Total Emissions (lb/day)
NO <sub>x</sub>	130	0.03	3.90
VOC	7	0.03	0.21
CO	35	0.03	1.05
PM10	7.5	0.03	0.23
SO <sub>x</sub>	0.83	0.03	0.02

### **Carbon Adsorbers**

As set forth in Table 2-2, approximately six carbon adsorbers were identified as needed to comply with PAR 1402. For these facilities, thermal oxidizers were not considered to be applicable as a method of controlling TAC emissions. As described in Chapter 1, the initial control efficiency of carbon adsorption equipment is extremely high. As the activated carbon becomes saturated with organic material over time, control efficiency drops until breakthrough occurs. When breakthrough occurs, the saturated carbon must be removed and either disposed of or regenerated and the solvent recovered, or removed and destroyed.

Typically, the carbon is regenerated by raising the temperature of the carbon, evacuating the bed, or both. A regenerant, either steam or a noncondensable gas, is heated and injected into the carbon bed to desorb the organic materials. This procedure can be performed daily, but may be done more or less frequently, depending on the capacity of the control unit and the concentration of the VOC being collected. The resulting heated organic mixture is vented to a condenser where the organic material is separated from the regenerant by gravity or distillation, and recycled or disposed of properly.

Regenerating carbon typically requires a combustion source using natural gas as the combustion fuel for boilers or steam generators used to heat the regenerant and/or to heat the carbon beds. Only 15 percent of the carbon bed volume collects toxic VOC emissions and a typical carbon bed is sized to reduce 55 pounds of VOC per day. Based on these two characteristics, a typical carbon bed size is approximately 400 pounds ( $55/0.15 = 400$ ). According to the Standard Handbook of Environmental Engineering (Corbitt, 1990), the projected natural gas fuel use is 5.5 scf per pound of carbon. For a worst case scenario, the carbon bed is assumed to be regenerated four times per day. From the calculation below, the amount of natural gas required per day is 0.053 MMcf.

$$(400 \text{ lbs C}) \times (5.5 \text{ scf/lb C per regen}) \times (4 \text{ regen/day}) \times (6 \text{ Carbon Adsorbers}) = 0.053 \text{ MMcf/day}$$

Using emission factors from the SCAQMD's AER Program, the projected criteria pollutant emissions from the combustion equipment used to regenerate spent carbon are listed in Table 2-6.

**Table 2-6 Estimated Operational Emissions from Regenerating Spent Carbon**

Criteria Pollutant	AER Emission Factor (lb/MMcf)	Amount of Natural Gas Consumed (MMcf/day)	Total Emissions (lb/day)
NO <sub>x</sub>	130	0.053	6.9
VOC	7.0	0.053	0.4
CO	35	0.053	1.9

**Operation-related Mobile Source Emissions**

Some types of control equipment generate waste products that will need to be disposed of properly. The wastes and controls include: spent carbon generated from the carbon adsorption process; solids and sludge from wet scrubbers; and dry solids from filtration controls. Although thermal oxidizers produce little or no waste products, this part of the air quality analysis assumed that catalytic oxidizers could be used instead of thermal oxidizers. The catalysts in catalytic oxidizers need to be replaced every few years so this potential waste product was considered to contribute to the waste transport impacts.

Any wastes generated will require delivery and transport to disposal or recycling facilities. It is assumed here that enough waste could be generated as a result of proposed project to require a “worst-case” scenario of 2 truck trips per day of the 24 affected facilities<sup>4</sup> installing APCDs to comply with PAR 1402. To calculate transport truck trip emissions, it is assumed that medium-duty trucks (5,000-8,500 pounds) would be used to transport waste, with two start-ups and the trucks would travel 20 miles each way.

**TOTAL OPERATIONAL EMISSIONS**

Total operational emissions from both stationary sources (control equipment) and mobile sources (waste disposal trucks) are shown in Table 2-7. As indicated in Table 2-7, operational emissions anticipated from implementing PAR 1402 do not exceed any significance threshold and therefore, are considered less than significant.

**Table 2-7 SCAQMD Operational Criteria Pollutant Emissions**

Description	CO	NO <sub>x</sub>	PM10	PM2.5	VOC	SO <sub>x</sub>
	(lb/day)					
Emissions from Thermal Oxidizers	1.05	3.90	0.23	--	0.21	0.02
Emissions from Regenerating Spent Carbon	1.86	6.89	--	--	0.37	--
Emissions from Mobile Sources <sup>5</sup>	0.3	1.4	0	0	0.1	0
<b>Total Operational Emissions</b>	3.21	12.19	0.23	0	0.68	0.02
Significance Threshold	550	55	150	55	75	150
Exceed Significance?	No	No	No	No	No	No

<sup>4</sup> See Section XVII for a further discussion.

<sup>5</sup> No new permanent employees are expected for operation of the control equipment as a result of PAR 1402; therefore no worker vehicles' emissions are calculated. However, delivery and disposal of new carbon or removal of spent catalysts is expected to generate mobile source emissions.

### **Indirect Criteria Pollutant Emissions from Electricity Consumption**

Indirect criteria pollutant and GHG emissions are expected from the generation of electricity to operate new equipment that occurs off-site at electricity generating facilities (EGFs). Emissions from electricity generating facilities are already evaluated in the CEQA documents for those projects when they are built or modified. The analysis in Section VI. Energy b), c) and d)) demonstrates that there is sufficient capacity from power providers for the increased electricity consumption from PAR 1402 and impacts are less than significant.

### **III. c) Less than significant impacts.**

#### ***Cumulatively Considerable Impacts***

As Lead Agency, the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant<sup>6</sup>.

This approach was upheld by the Court in *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal. App. 4th 327, 334. The Court determined that where it can be found that a project did not exceed the SDAPCD's established air quality significance thresholds, the City of Chula Vista properly concluded that the project would not cause a significant environmental effect, nor result in a cumulatively considerable increase in these pollutants. The court found this determination to be consistent with CEQA Guidelines §15064.7, stating, "The lead agency may rely on a threshold of significance standard to determine whether a project will cause a significant environmental effect." The court found that, "Although the project will contribute additional air pollutants to an existing nonattainment area, these increases are below the significance criteria..." "Thus, we conclude that no fair argument exists that the Project will cause a significant unavoidable cumulative contribution to an air quality impact." As in *Chula Vista*, here the District has demonstrated, when using accurate and appropriate data and assumptions, that the project will not exceed the established SCAQMD significance thresholds. See also, *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal. App. 4th 899. Here again the court upheld the lead agency's approach to utilizing the established air quality significance thresholds to determine whether the impacts of a project would be cumulatively considerable. Thus, it may be concluded that the Project will not cause a significant unavoidable cumulative contribution to an air quality impact.

Based on the foregoing analysis, project-specific air quality impacts from PAR 1402 would not exceed air quality significance thresholds; therefore, potential adverse impacts from PAR 1402 would not be "cumulatively considerable" as defined by CEQA Guidelines §15064(h)(1) for air quality impacts. Per CEQA Guidelines §15064(h)(4), the mere existing of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that PAR 1402's incremental effects are cumulatively considerable. Furthermore, in Section III.a), PAR 1402 was found not to conflict with the 2012 AQMP, which is the currently adopted regional air quality plan

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<sup>6</sup> SCAQMD Cumulative Impacts Working Group White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution, August 2003, Appendix D, Cumulative Impact Analysis Requirements Pursuant to CEQA, at D-3, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4>

for the Basin. Therefore, the cumulative impacts from PAR 1402 are considered less than significant.

**III. d) No impacts.**

***Toxic Air Contaminants (TAC) – Construction***

**Localized Significance Thresholds**

The localized significance threshold (LST) methodology was developed to assist lead agencies to analyze localized impacts associated with proposed projects. Since PAR 1402 affects facilities located across the region and it is unknown where future construction would be located, a LST analysis is not possible.

Diesel exhaust particulate is considered a carcinogenic and chronic TAC. Construction TAC emissions (diesel particulate matter [DPM]) may be generated from diesel exhaust emissions (i.e. heavy-duty trucks and construction equipment) at each facility and is a localized impact. Since construction is expected to last less than two months for each facility and carcinogenic health risk is estimated over a 25 year exposure period for off-site occupational receptors and a 30 year exposure period for sensitive receptors, diesel exhaust particulate from construction is not expected to generate significant adverse health risk impacts.

SCAQMD currently does not have guidance on construction Health Risk Assessments and only applies the revised OEHHA Guidelines for operational impacts.

Therefore, PAR 1402 is not expected to generate significant adverse TAC impacts from construction.

***Toxic Air Contaminants (TAC) – Operation***

**Direct Health Risk Reductions from PAR 1402**

PAR 1402 would be expected to reduce overall TAC emissions. Therefore, PAR 1402 is expected to have the benefit of reducing adverse health risk impacts from the facilities to nearby sensitive receptors.

**Secondary Health Risk Impacts from PAR 1402**

The operation of non-combustion APCDs, that may be needed to comply with PAR 1402, are not expected to generate any TAC emissions. These APCDs are expected to be powered by electricity and there's availability currently to meet the demand, so no new combustion emissions would be generated.

The thermal oxidizers would generate TAC emissions (i.e. benzene, formaldehyde, and polycyclic aromatic hydrocarbons) from the combustion of natural gas. These thermal oxidizers will be subject to SCAQMD Air Permits and toxic rules. This is a voluntary risk reduction program and any toxics from APCDs will be evaluated as part of a Risk Reduction Plan for each facility to ensure that the total facility cancer risks stay below 10 per million.

Based on the above discussion, PAR 1402 is not expected to expose sensitive receptors to substantial concentrations.

### III. e) No impact.

#### *Odor Impacts*

The operation of new APCDs are not expected to generate any new odors as APCDs are not typically odor generating equipment. The new APCDs would be designed to reduce TAC emissions from facilities, which may potentially further reduce odors.

Therefore, PAR 1402 is not expected to generate significant adverse odor impacts.

### III. g) and h) Less than significant impacts.

#### *Greenhouse Gas Impacts*

Global warming is the observed increase in average temperature of the earth's surface and atmosphere. The primary cause of global warming is an increase of greenhouse gas (GHG) emissions in the atmosphere. The six major types of GHG emissions are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs). The GHG emissions absorb longwave radiant energy emitted by the earth, which warms the atmosphere. The GHGs also emit longwave radiation both upward to space and back down toward the surface of the earth. The downward part of this longwave radiation emitted by the atmosphere is known as the "greenhouse effect."

The current scientific consensus is that the majority of the observed warming over the last 50 years can be attributable to increased concentration of GHG emissions in the atmosphere due to human activities. Events and activities, such as the industrial revolution and the increased consumption of fossil fuels (e.g., combustion of gasoline, diesel, coal, etc.), have heavily contributed to the increase in atmospheric levels of GHG emissions. As reported by the California Energy Commission (CEC), California contributes 1.4 percent of the global and 6.2 percent of the national GHG emissions (CEC, 2004). Further, approximately 80 percent of GHG emissions in California are from fossil fuel combustion (e.g., gasoline, diesel, coal, etc.).

GHGs are typically reported as CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e). CO<sub>2</sub>e is the amount of CO<sub>2</sub> that would have the same global warming potential (relative measure of how much heat a greenhouse gas traps in the atmosphere) as a given mixture and amount of greenhouse gas. CO<sub>2</sub>e is estimated by the summation of mass of each GHG multiplied by its global warming potential (global warming potentials: CO<sub>2</sub> = 1, CH<sub>4</sub> = 21, N<sub>2</sub>O = 310, etc.).<sup>7</sup>

#### **Construction**

Based on the same assumptions made for the criteria pollutant estimates, approximately 346 metric tons of CO<sub>2</sub>e per facility would be generated from all construction activity including: grading, site preparation, paving, equipment installation, and construction and worker vehicles. Thus, since there are 24 facilities, there will be approximately 10,378 CO<sub>2</sub>e generated from construction due to PAR 1402. Amortized over 30 years as prescribed by the SCAQMD Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans adopted by the SCAQMD Governing Board in December 2008, approximately 346 metric tons of CO<sub>2</sub>e emissions per year (see Appendix B for calculations) would be generated from construction activities over the life of the project.

<sup>7</sup> California Air Resource Board Conversion Table: <http://www.arb.ca.gov/cc/facts/conversiontable.pdf>

**Operation**

The operation of the HEPA filters, oxidation catalysts, and wet scrubbers are not expected to generate greenhouse gases. However, the operation of thermal oxidizers, carbon adsorbers, and delivery/disposal trucks are equal to 4,538.56 metric tons of CO<sub>2</sub>e per year.

**Total GHG Emissions**

PAR 1402 may result in the generation of 346 CO<sub>2</sub>e amortized metric tons of CO<sub>2</sub>e construction emissions per year and 4,538.56 metric tons of CO<sub>2</sub>e operational emissions per year. The addition of 4,884.56 metric tons of CO<sub>2</sub>e emissions is less than the SCAQMD significance threshold of 10,000 metric tons per year for CO<sub>2</sub>e from industrial projects.

Based upon these considerations, PAR 1402 would not generate significant adverse construction or operational air quality impacts and, therefore, no further analysis is required or necessary and no mitigation measures are necessary or required.

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**IV. BIOLOGICAL RESOURCES.**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### **Significance Criteria**

Impacts on biological resources will be considered significant if any of the following criteria apply:

- The project results in a loss of plant communities or animal habitat considered to be rare, threatened or endangered by federal, state or local agencies.
- The project interferes substantially with the movement of any resident or migratory wildlife species.
- The project adversely affects aquatic communities through construction or operation of the project.

### **DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**IV. a), b), c), & d) No Impact.** All of the affected units operating at existing facilities are located primarily in developed industrial areas, which have already been greatly disturbed and paved. These areas currently do not support riparian habitat, federally protected wetlands, or migratory corridors. Additionally, special status plants, animals, or natural communities are not expected to be found within close proximity to the affected facilities. Therefore, PAR 1402 would have no direct or indirect impacts that could adversely affect plant or animal species or the habitats on which they rely in the SCAQMD’s jurisdiction. While some of the APCDs may be located at new facilities, the rule amendment does not cause the new facilities to be built. Construction of the required APCDs in itself would not have any impact on plants or animals beyond the impact of construction and operating a new source itself. The current and expected future land use development to accommodate population growth is primarily due to economic considerations or local government planning decisions. A conclusion in the Final Program EIR for the 2012 AQMP was that population growth in the region would have greater adverse effects on plant species and wildlife dispersal or migration corridors in the basin than SCAQMD regulatory activities, (e.g., air quality control measures or regulations). In addition, by reducing air pollutants, biological resources will benefit. Therefore, no impacts are anticipated.

**IV. e) & f) No Impact.** PAR 1402 is not envisioned to conflict with local policies or ordinances protecting biological resources or local, regional, or state conservation plans. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by PAR 1402. Additionally, PAR 1402 will not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other relevant habitat conservation plan, and would not create divisions in any existing communities because all activities associated with complying with PAR 1402 will occur at existing industrial facilities. Therefore, no impacts are anticipated.

Based upon these considerations, significant biological resources impacts are not expected from implementing PAR 1402. Since no significant biological resources impacts were identified for any of the issues, no mitigation measures are necessary or required.

**V. CULTURAL RESOURCES.**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource, site, or feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to cultural resources will be considered significant if:

- The project results in the disturbance of a significant prehistoric or historic archaeological site or a property of historic, cultural significance, or tribal cultural significance to a community or ethnic or social group or a California Native American tribe.
- Unique paleontological resources or objects with cultural value to a California Native American tribe are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**V. a) No Impact.** Since construction-related activities associated with the implementation of PAR 1402 are expected to be confined within the existing footprint of the affected facilities that either have been fully developed and paved, or will be developed regardless of whether the project is approved, no impacts to historical resources are expected to occur as a result of implementing PAR 1402. Therefore, no impacts are anticipated.

**V. b), c), & d) No Impact.** Installing or modifying add-on controls and other associated equipment to comply with PAR 1402 may require disturbance of previously disturbed areas at the affected existing industrial facilities. However, since construction-related activities are expected to be confined within the existing footprint of the affected facilities that have been fully developed and

paved, or will be regardless of whether the project is approved, PAR 1402 is not expected to require physical changes to the environment, which may disturb paleontological or archaeological resources. Furthermore, it is envisioned that these areas are already either devoid of significant cultural resources or whose cultural resources have been previously disturbed. As noted in Section IV, the project does not cause new source construction, regardless, this will occur whether or not the project is approved. Therefore, PAR 1402 has no potential to cause a substantial adverse change to a historical or archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains, including those interred outside a formal cemeteries. PAR 1402 is, therefore, not anticipated to result in any activities or promote any programs that could have a significant adverse impact on cultural resources in the District. Therefore, no impacts are anticipated.

Based upon these considerations, significant cultural resources impacts are not expected from implementing PAR 1402. Since no significant cultural resources impacts were identified for any of the issues, no mitigation measures are necessary or required.

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**VI. ENERGY.**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with adopted energy conservation plans?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the need for new or substantially altered power or natural gas utility systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Create any significant effects on local or regional energy supplies and on requirements for additional energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create any significant effects on peak and base period demands for electricity and other forms of energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with existing energy standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to energy resources will be considered significant if any of the following criteria are met:

- The project conflicts with adopted energy conservation plans or standards.
- The project results in substantial depletion of existing energy resource supplies.
- An increase in demand for utilities impacts the current capacities of the electric and natural gas utilities.
- The project uses non-renewable resources in a wasteful and/or inefficient manner.

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**VI. a) & e) No impact.** PAR 1402 does not require any action which would result in any conflict with an adopted energy conservation plan or violation of any energy conservation standard. PAR 1402 is not expected to conflict with adopted energy conservation plans because existing facilities would be expected to continue implementing any existing energy conservation plans.

PAR 1402 is not expected to cause new development. The local jurisdiction or energy utility sets standards (including energy conservation) and zoning guidelines regarding new development and will approve or deny applications for building new equipment at the affected facility. During the local land use permit process, the project proponent may be required by the local jurisdiction or energy utility to undertake a site-specific CEQA analysis to determine the impacts, if any, associated with the siting and construction of new development.

As a result, PAR 1402 would not conflict with energy conservation plans, use non-renewable resources in a wasteful manner, or result in the need for new or substantially altered power or natural gas systems.

**VI. b), c) & d. Less than Significant Impact.** In the event a facility may partake in this program, increased energy use would be expected (i.e. natural gas, diesel, electricity, etc.) depending on the chosen APCD. There may be an increase in electricity consumption associated with the new APCD. Diesel fuel would be consumed by construction equipment. Gasoline fuel would be consumed by the construction workers vehicles. Natural gas fuel would be consumed by the new thermal oxidizers. The following sections evaluate the various forms of energy sources affected by PAR 1402.

### **Construction-Related Impacts**

During the construction phases, diesel and gasoline fuel will be consumed in construction equipment (e.g., cranes, backhoes, etc.) and by construction workers' vehicles traveling to and from construction sites. To estimate "worst-case" energy impacts associated with the construction phases of PAR 1402, it is assumed that the portable equipment would be operated up to 960 hours in a year (up to 8 hours per day for 120 days).

To estimate construction workers' fuel usage per round trip, it is assumed that workers' vehicles would get 20 miles to the gallon and would travel 40 miles round trip to and from the construction site in one day. Table 2-8 lists the projected energy impacts associated with the construction and installation at the three affected facilities at any given time. Please refer to Appendix B for the assumptions used to estimate fuel usage associated with the implementation of PAR 1402.

**Table 2-8 Total Projected Fuel Usage for Construction Activities**

<b>Fuel Type</b>	<b>Year 2012 Projected Basin Fuel Demand<sup>a</sup> (mmgal/yr)</b>	<b>Fuel Usage<sup>b</sup> (mmgal/yr)</b>	<b>Total % Above Baseline</b>	<b>Exceed Significance?</b>
Diesel	524	0.0014	3.0E-10	No
Gasoline	5,589	0.012	2.1E-12	No

<sup>a</sup> Figures taken from Table 3.3-3 of the 2012 AQMP Final EIR

<sup>b</sup> Estimated peak fuel usage from the implementation of the proposed amendments. Diesel usage estimates are based on portable construction equipment operation. Gasoline usage estimates are derived from workers' vehicle daily trips to and from work.

### **Operational Energy Impacts**

Any operational natural gas impacts associated with implementing PAR 1402 are attributable to fuel consumed in thermal oxidizers used by affected facilities to reduce toxic risk. According to Table 2-2, approximately three thermal oxidizers could use some type of oxidation device to comply with the risk reduction requirements in PAR 1402. To estimate natural gas fuel usage from thermal oxidizer operation, it is assumed that the three units (one unit per facility) would operate twenty-four hours per day, seven days per week, 52 weeks per year and fire natural gas only. At an exhaust emission flow rate of 10,000 cfm, the amount of natural gas consumed is 0.488 MMBTU/hr and 28 kW of instantaneous power.

$(3 \text{ Thermal Oxidizers} \times 24 \text{ hrs/day} \times 7 \text{ days/wk} \times 52 \text{ wks/yr} \times 0.488 \text{ MMBTU/hr}) / (1050 \text{ MMBTU/MMcf}) = 12.18 \text{ MMcf per year or } 0.03 \text{ MMcf/day}$

Table 2-9 lists the projected natural gas impacts associated with the operational phase of the proposed amendments. The natural gas usage from PAR 1402 is negligible compared to the demand of natural gas available in the district.

**Table 2-9 Total Projected Natural Gas Usage for Thermal Oxidizer Operations**

Year	Projected Regional Natural Gas Demand <sup>a</sup> (mmcf/day)	Project Total Natural Gas Usage <sup>b</sup> (mmcf/day)	Total Impact % of Capacity	Significant?
2010	493	0.03	0.006	No

<sup>a</sup> Figures taken from Table 3.3-6 of the 2012 AQMP Final EIR-Commercial Sector

<sup>b</sup> Estimated natural gas usage from the implementation of PAR 1402.

### Electricity Impacts

There will be additional electricity usage for the new APCDs. Electrical energy impacts associated with ancillary equipment (e.g., fans, motors, etc.) used in conjunction with the three thermal oxidizers, six HEPA filters, six carbon adsorbers, and ten wet scrubbers will need 25 blowers. As shown in Table 2-10, the additional electricity consumption is less than significant.

**Table 2-10 PARs Additional Electricity Consumption**

Energy	Consumption (GW-h)
25 Blowers (100 bhp @ 0.001788 GW-h) x 25	0.045
SCAQMD District Electrical Demand <sup>1</sup>	113,109
<b>Total Impact % of Capacity</b>	<b>3.0E-5</b>
<b>Significant?</b>	<b>No</b>

<sup>1</sup>AQMP 2012 TABLE 3.3-1 2011 Electricity Use GWh (Aggregated, includes self generation and renewables)

Therefore, operational activities associated with the implementation of PAR 1402 will not result in the need for new or substantially altered power systems, will not result in substantial depletion of existing energy resource supplies; nor will significant amounts of electricity or fuel be needed when compared to existing supplies. Therefore, impacts are less than significant.

Based upon these considerations, significant adverse energy impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**VII. GEOLOGY AND SOILS.**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts on the geological environment will be considered significant if any of the following criteria apply:

- Topographic alterations would result in significant changes, disruptions, displacement, excavation, compaction or over covering of large amounts of soil.
- Unique geological resources (paleontological resources or unique outcrops) are present that could be disturbed by the construction of the proposed project.
- Exposure of people or structures to major geologic hazards such as earthquake surface rupture, ground shaking, liquefaction or landslides.

- Secondary seismic effects could occur which could damage facility structures, e.g., liquefaction.
- Other geological hazards exist which could adversely affect the facility, e.g., landslides, mudslides.

## **DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**VII. a) No Impact.** Since PAR 1402 would result in construction activities at existing facilities located in developed industrial settings to install or modify control equipment, little site preparation is anticipated that could adversely affect geophysical conditions in the jurisdiction of the SCAQMD. While some APCDs may be installed at new facilities, the project does not cause the new facility construction. Southern California is an area of known seismic activity. Accordingly, the installation of add-on controls at existing or new affected facilities to comply with PAR 1402 is expected to conform to the Uniform Building Code and all other applicable state and local building codes. As part of the issuance of building permits, local jurisdictions are responsible for assuring that the Uniform Building Code is adhered to and can conduct inspections to ensure compliance. The Uniform Building Code is considered to be a standard safeguard against major structural failures and loss of life. The basic formulas used for the Uniform Building Code seismic design require determination of the seismic zone and site coefficient, which represents the foundation condition at the site. The Uniform Building Code requirements also consider liquefaction potential and establish stringent requirements for building foundations in areas potentially subject to liquefaction. Thus, PAR 1402 would not alter the exposure of people or property to geological hazards such as earthquakes, landslides, mudslides, ground failure, or other natural hazards. As a result, substantial exposure of people or structures to the risk of loss, injury, or death involving the rupture of an earthquake fault, seismic ground shaking, ground failure or landslides is not anticipated.

**VII. b) Less than Significant Impact.** Since add-on controls will be installed at existing developed facilities, during construction of PAR 1402, a less than significant impact exists for temporary erosion resulting from grading activities, if required (controls included as part of new facilities are not expected to cause erosion or excavating beyond that otherwise resulting from constructing the new facility). These activities are expected to be minor since the existing facilities are generally flat and have previously been graded and paved. Further, wind erosion is not expected to occur to any appreciable extent, because operators at dust generating sites would be required to comply with the best available control measure (BACM) requirements of SCAQMD Rule 403 – Fugitive Dust. In general, operators must control fugitive dust through a number of soil stabilizing measures such as watering the site, using chemical soil stabilizers, revegetating inactive sites, etc. PAR 1402 involves the installation or modification of add-on control equipment at existing facilities, so that grading could be required to provide stable foundations. Potential air quality impacts related to grading are addressed elsewhere in this EA (as part of construction air quality impacts). No unstable earth conditions or changes in geologic substructures are expected to result from implementing PAR 1402. Therefore, impacts are less than significant.

**VII. c) No Impact.** Since PAR 1402 will affect existing facilities, it is expected that the soil types present at the affected facilities will not be made further susceptible to expansion or liquefaction. Furthermore, subsidence is not anticipated to be a problem since only minor excavation, grading, or filling activities are expected occur at affected facilities. Additionally, the affected areas are not envisioned to be prone to new landslide impacts or have unique geologic features since the affected equipment units are located at existing facilities in industrial areas. Controls installed at new facilities would not increase these risks beyond those resulting from the new facility itself. Therefore, no impacts are anticipated.

**VII. d) & e) No Impact.** Since PAR 1402 will affect equipment units at existing facilities located in industrial zones, it is expected that people or property will not be exposed to new impacts related to expansive soils or soils incapable of supporting water disposal. Further, typically each affected facility has some degree of existing wastewater treatment systems that will continue to be used and are expected to be unaffected by PAR 1402. Sewer systems are available to handle wastewater produced and treated by each affected facility. Each existing facility affected by PAR 1402 does not require installation of septic tanks or alternative wastewater disposal systems. As a result, PAR 1402 will not require facility operators to utilize septic systems or alternative wastewater disposal systems. Thus, implementation of PAR 1402 will not adversely affect soils associated with a septic system or alternative wastewater disposal system. Therefore, no impacts are anticipated.

Based upon these considerations, significant geology and soils impacts are not expected from the implementation of PAR 1402. Since no significant geology and soils impacts were identified for any of the issues, no mitigation measures are necessary or required.

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**VIII. HAZARDS AND HAZARDOUS MATERIALS.**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport or a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Significantly increased fire hazard in areas with flammable materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### **Significance Criteria**

- Non-compliance with any applicable design code or regulation.
- Non-conformance to National Fire Protection Association standards.
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG) 2 levels.

### **DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**VIII. a) & b) Less Than Significant Impact.** The facilities affected by PAR 1402 are currently located in urbanized industrial or commercial areas. PAR 1402 will increase the amount of captured toxic emissions through the use of additional air pollution control equipment. Thus, the capture of these emissions would reduce toxic exposure to the public and the environment.

Oxidation systems can be susceptible to compressor failure and flame flashbacks, particularly during startup and shutdown. As a result, oxidation systems could pose potential hazard risks primarily to workers or to a lesser extent the public in the event of explosions or fires. Oxidation systems historically have a good safety record when operated properly according to the manufacturers’ instruction. Proper tune-up and maintenance is also important and necessary to avoid failures or explosions. When installed, operated, and maintained properly, oxidation systems are not expected to create fire or explosion hazards to workers or the public in general.

Operation of a carbon adsorption control system has potential hazard risks, primarily during the desorption cycle when there is a slight risk of explosion or release of T-VOC into the atmosphere. Carbon adsorption systems may also represent a fire risk during operation when carbon particles are saturated with solvent. Although most halogenated hydrocarbons have low flammability potential, use of such solvents is expected to decrease due to implementation of regulations to prevent global warming and stratospheric ozone depletion. Therefore, fire risks associated with carbon adsorption systems could differ depending upon the solvents used in place of halogenated compounds. Further, hazard risks would depend on the flammability of the material, concentration of T-VOC adsorbed into the activated carbon, ambient oxygen levels, characteristics of the specific system, and the operating conditions. Additionally, use of carbon adsorption units may concentrate hazardous organic compounds into the spent carbon, requiring recycling or disposal. This practice may generate environmental hazards during handling and disposal.

The engineering specifications for a carbon adsorption unit are typically designed to guard against risks by including an energy balance, which is an acceptable range of temperatures for the carbon bed. Good engineering practice means this range of temperatures should not exceed the lower explosive limit (LEL) of the compound(s) being adsorbed. There is little risk of fire if the LEL is not exceeded.

In addition to following good engineering practice for both thermal oxidizers and carbon adsorption systems, Health and Safety Code §25506 specifically requires all businesses handling

hazardous materials to submit a business emergency response plan to assist local administering agencies in the emergency release or threatened release of a hazardous material. Business emergency response plans generally require the following:

- \* Identification of individuals who are responsible for various actions, including reporting, assisting emergency response personnel and establishing an emergency response team;
- \* Procedures to notify the administering agency, the appropriate local emergency rescue personnel, and the California Office of Emergency Services;
- \* Procedures to mitigate a release or threatened release to minimize any potential harm or damage to persons, property or the environment;
- \* Procedures to notify the necessary persons who can respond to an emergency within the facility;
- \* Details of evacuation plans and procedures;
- \* Descriptions of the emergency equipment available in the facility;
- \* Identification of local emergency medical assistance; and
- \* Training (initial and refresher) programs for employees in:
  1. The safe handling of hazardous materials used by the business;
  2. Methods of working with the local public emergency response agencies;
  3. The use of emergency response resources under control of the handler;
  4. Other procedures and resources that will increase public safety and prevent or mitigate a release of hazardous materials.

In general, every county or city and all facilities using a minimum amount of hazardous materials are required to formulate detailed contingency plans to eliminate, or at least minimize, the possibility and effect of fires, explosion, or spills. In conjunction with the California Office of Emergency Services, local jurisdictions have enacted ordinances that set standards for area and business emergency response plans. These requirements include immediate notification, mitigation of an actual or threatened release of a hazardous material, and evacuation of the emergency area.

Further, all hazardous materials are expected to be used in compliance with established OSHA or Cal/OSHA regulations and procedures, including providing adequate ventilation, using recommended personal protective equipment and clothing, posting appropriate signs and warnings, and providing adequate worker health and safety training.

When taken together, the above regulations provide comprehensive measures to reduce hazards of explosive or otherwise hazardous materials. Compliance with these and other federal, state and local regulations and proper operation and maintenance of equipment should ensure the potential for explosions or accidental releases of hazardous materials is less than significant.

Each facility is already equipped with at least one APCD. Hazardous material is already properly transported for treatment offsite and/or out of the Basin. The additional hazardous material captured by the new air pollution control systems would be hauled off to a hazardous landfill, which is what the facilities are currently doing. Hence, no new significant hazards are expected to the public or environment through its routine transport, use and disposal.

Therefore, PAR 1402 is not expected to create a significant hazard to the public or environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment and the impact is considered less than significant.

**VIII. c) Less Than Significant Impact.** There are six affected facilities located within a quarter mile of any school. However, it is expected that these facilities near schools are taking the appropriate and required actions to ensure proper handling of hazardous or acutely hazardous materials, substances or wastes within one-quarter mile of an existing or proposed school.

Each facility is already equipped with at least one APCD. Hazardous material should be already properly handled to comply with all of the appropriate rules and regulations (i.e. DOT, DTSC, EPA, etc.) for treatment offsite and/or out of the Basin. PAR 1402 does not change non-conformance with any applicable hazardous regulations.

In addition to complying with hazardous regulations, SCAQMD has public notification procedures (Rule 212- Standards for Approving Permits and Issuing Public Notice) prior to granting facilities a Permit to Construct or permit modification for facilities near a school. Rule 212 informs and makes the students of affected schools aware of any proposed air pollution emitting equipment. Therefore, impacts are less than significant.

**VIII. d) Less Than Significant Impact.** Government Code §65962.5 refers to the "Hazardous Waste and Substances Site List," which is a list of facilities that may be subject to the Resource Conservation and Recovery Act (RCRA) corrective action program. There are eleven affected facilities that are included on the list prepared by the Department of Toxic Substances Control (DTSC) pursuant to Government Code §65962.5, some of the facilities are included on a list of RCRA-permitted sites that require corrective action as identified by DTSC. Furthermore, some of the affected facilities may be subject to corrective action under the Spill Cleanup Program (SCP) formerly "Spills, Leaks, Investigation & Cleanup (SLIC) Program" administered by the Regional Water Quality Control Board (RWQCB) pursuant to California Water Code §13304.

In the event that the installation of new or modification of existing air pollution control equipment would involve soil disturbing activities such as grading and excavation during construction of the proposed project, there is the potential for uncovering some contaminated soil. Contaminated soil is defined in SCAQMD Rule 1166 - Volatile Organic Compound Emissions From Decontamination of Soil, as soil with the potential to meet or exceed a VOC concentration of 50 ppmv. Rule 1166 includes requirements for SCAQMD notification at least 24 hours prior to the start of excavation activities, monitoring (at least once every 15 minutes, within three inches of the excavated soil surface), as well as implementation of a mitigation plan when VOC-contaminated soil is detected. To ensure compliance with SCAQMD Rule 1166, the affected facility or a construction contractor will need to obtain a pre-approved SCAQMD Rule 1166 VOC-Contaminated Soil Mitigation Plan (Plan) in order to assure that fugitive emissions will be controlled prior to the start of excavation activities. In general, a SCAQMD Rule 1166 Plan will

require the contaminated soil pile to be covered with heavy plastic sheeting and will include watering requirements to assure the soil remains moist and will require removal of the VOC-contaminated soils from the disturbed site within 30 days from the time of excavation.

Soil remediation activities are also under the jurisdiction of the RWQCB and are implemented via a Soil Management Plan for the management of small quantities of contaminated soil. Following SCAQMD approval of a Rule 1166 Plan, a Soil Management Plan will need to be submitted to the RWQCB for approval. The RWQCB, when considering the Soil Management Plan, relies on the analysis in this CEQA document and the SCAQMD Rule 1166 Plan.

In the event that any excavated soils contain concentrations of certain substances, such as heavy metals and hydrocarbons, the handling, processing, transportation and disposal of the contaminated soil would also be subject to applicable hazardous waste regulations (i.e., Title 22 of the California Code of Regulations and other local and federal rules). Title 22, Division 4.5 - Environmental Health Standards for the Management of Hazardous Waste has multiple requirements for hazardous waste characterization, handling, transport, and disposal, such as requirements to use approved disposal and treatment facilities, to use certified hazardous waste transporters, and to have manifests for tracking the hazardous materials. If discovered, contaminated excavated soil would be properly characterized to determine an appropriate offsite processing method(s). These methods may include recycling of the soil if it is considered a non-hazardous waste, off-site treatment to reduce the contaminant concentrations to non-hazardous levels so that the treated soil could be used as landfill cover, or disposal as a hazardous waste at a permitted hazardous waste facility.

In addition, there are other regulatory requirements that address the discovery and remediation of contaminated sites, including the discovery of such sites during construction activities. Further, health and safety plans, worker training, and various other activities which serve to protect workers from exposure to contamination are also required. The following federal and state regulatory requirements are specific to worker protection and contaminated soil discovery:

- Hazardous Waste Operations and Emergency Response Standard (HAZWOPER, Fed-OSHA, 29 CFR 1910.120 and Cal-OSHA HAZWOPER, 8 CCR 5192) including the requirements for health and safety plans, worker training, evaluation of the potential for chemical exposure, and physical hazards at the site.
- Resource Conservation and Recovery Act and Associated Hazardous and Solid Waste Amendments (40 CFR 260) are the federal laws and regulations that govern the generation, transportation, treatment, and disposal of hazardous waste.
- Hazardous Waste Control Law (California Health and Safety Code, Chapter 6.5) governs the generation, transportation, treatment, and disposal of hazardous waste.
- Cal-OSHA Construction Worker Safety Orders in Title 8 CCR including Permissible Exposure Levels (8 CCR 5155), injury and illness prevention plans, and workplace safety.

Hazardous wastes from the existing affected facilities are required to be managed in accordance with applicable federal, state, and local rules and regulations. Thus, while the types of additional waste that may be generated from implementing the proposed project could potentially change from the existing setting, the affected facilities would still be required to comply with all of the

aforementioned regulations. For example, if the use of a new or increased use of an existing catalyst is needed to operate the installed or modified air pollution control equipment, for those affected facilities which already use catalyst for other operational activities on-site, the additional collected spent catalyst will continue to be handled in the same manner as currently handled such that it will be disposed and/or recycled at approved facilities. Further, if any of other affected facilities are new to handling catalyst waste, the same disposal/recycling procedures are expected to be followed.

For any affected facility that is designated pursuant to Government Code §65962.5 as a large quantity generator of hazardous waste, complying with the proposed project will not alter in any way how each facility would manage their hazardous wastes and each affected facility would be expected to continue to be managed in accordance with all applicable federal, state, and local rules and regulations. Similarly, for any affected facility that is not designated pursuant to Government Code §65962.5 as a large quantity generator, implementing the proposed project would not change a facility's status regarding hazardous waste generation. Thus, implementing the proposed project would not be expected to interfere with site cleanup activities or create additional site contamination. Thus, for the aforementioned reasons, less than significant hazards impacts from the soil disturbing activities as well as the disposal and/or recycling of hazardous materials are expected from implementing the proposed project. Therefore, impacts are less than significant.

**VIII. e) No Impact.** Federal Aviation Administration, 14 CFR Part 77 – Safe, Efficient Use and Preservation of the Navigable Airspace<sup>8</sup>, provides information regarding the types of projects that may affect navigable airspace. Projects may adversely affect navigable airspace if they involve construction or alteration of structures greater than 200 feet above ground level within a specified distance from the nearest runway or objects within 20,000 feet of an airport or seaplane base with at least one runway more than 3,200 feet in length and the object would exceed a slope of 100:1 horizontally (100 feet horizontally for each one foot vertically from the nearest point of the runway).

Construction activities from implementing the proposed project are expected to occur within the existing confines of the affected facilities. However, some of these facilities may be located within two miles of an airport (either public or private) and are located within an airport land use plan. Nonetheless, the installation of the toxic control devices is expected to be constructed according to the all appropriate building, land use and fire codes and operated at a low enough height relative to existing flight patterns so that the structure would not interfere with plane flight paths consistent with Federal Aviation Regulation, Part 77. Such codes are designed to protect the public from hazards associated with normal operation. Therefore, the proposed project is not expected to result in a safety hazard for people residing or working in the area of the affected facilities even if construction would occur within the vicinity of an airport. Further, since no significant impacts were identified for this issue, no mitigation measures are necessary or required.

**VIII. f) No Impact.** Emergency response plans are typically prepared in coordination with the local city or county emergency plans to ensure the safety of the public (surrounding local communities), and the facility employees as well. PAR 1402 would not impair implementation

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<sup>8</sup> Department of Transportation. Federal Aviation Administration, 14 CFR Part 77 [Docket No. FAA–2006–25002; Amendment No. 77–13] RIN 2120–AH31. *Safe, Efficient Use and Preservation of the Navigable Airspace*. 42296 Federal Register / Vol. 75, No. 139 / Wednesday, July 21, 2010 / Rules and Regulations. <http://www.gpo.gov/fdsys/pkg/FR-2010-07-21/pdf/2010-17767.pdf>.

of, or physically interfere with any adopted emergency response plan or emergency evacuation plan. It is expected that the existing affected facilities already have an emergency response plan in place, where required. The addition of air pollution control equipment is not expected to require modification of the existing emergency response plan at the affected facilities. Thus, PAR 1402 is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and no impacts are anticipated.

**VIII. g) No Impact.** It is not known if the affected facilities are adjacent to wildlands. However, PAR 1402 does not result in any new or relocated facilities adjacent to wildland areas. Therefore, no impacts are anticipated.

PAR 1402 would also not increase the existing risk of fire hazards in areas with flammable brush, grass, or trees. No substantial or native vegetation typically exists on or near the affected facilities. So PAR 1402 is not expected to expose people or structures to wild fires. Therefore, no significant increase in fire hazards is expected at the affected facilities associated with PAR 1402.

**VIII. h) Less Than Significant Impact.** The three thermal oxidizers may have a risk of flammability because of the open burner. However, operators must comply with the Uniform Fire Code and Uniform Building Code. These codes set standards intended to minimize risks from flammable or otherwise hazardous materials. Local jurisdictions are required to adopt the uniform codes or comparable regulations. Local fire agencies require permits for the use or storage of hazardous materials and permit modifications for proposed increases in their use. Permit conditions depend on the type and quantity of the hazardous materials at the facility. Permit conditions may include, but are not limited to, specifications for sprinkler systems, electrical systems, ventilation, and containment. The fire departments make annual business inspections to ensure compliance with permit conditions and other appropriate regulations. Further, businesses are required to report increases in the storage or use of flammable and otherwise hazardous materials to local fire departments. Local fire departments ensure that adequate permit conditions are in place to protect against potential risk of upset. PAR 1402 would not change the existing requirements and permit conditions. Therefore, PAR 1402 is not expected to create a significant hazard to the public or environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment and impacts are less than significant.

Based upon these considerations, significant adverse hazards and hazardous materials impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**IX. HYDROLOGY AND WATER QUALITY.**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards, waste discharge requirements, exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, or otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion or siltation on- or off-site or flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Place housing or other structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
g) Require or result in the construction of new water or wastewater treatment facilities or new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria**

Potential impacts on water resources will be considered significant if any of the following criteria apply:

Water Demand:

- The existing water supply does not have the capacity to meet the increased demands of the project, or the project would use more than 262,820 gallons per day of potable water.
- The project increases demand for total water by more than five million gallons per day.

Water Quality:

- The project will cause degradation or depletion of ground water resources substantially affecting current or future uses.
- The project will cause the degradation of surface water substantially affecting current or future uses.
- The project will result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.
- The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system are not sufficient to meet the needs of the project.
- The project results in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The project results in alterations to the course or flow of floodwaters.

## **DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**IX. a) & g) Less Than Significant Impact.** PAR 1402 is not expected to alter any existing wastewater treatment requirements or otherwise substantially degrade water quality that the requirements are meant to protect because the small volume expected through the APCDs should not warrant a modification to their existing permit.

The potential increase in wastewater volume generated by the proposed amendments is well within the existing and projected overall capacity of POTWs in the district. If PAR 1402 does exceed a facilities’ wastewater discharge limit, the POTW may deem that a secondary peak permit could be required to allow the discharge during non-peak hours. Significance thresholds for industrial wastewater discharge are determined by its impact to the affected sewer system. Therefore, wastewater impacts associated with the disposal of waterborne clean-up waste material generated from implementing the proposed amendments are less than significant.

**IX. b) & h) Less Than Significant Impact.** As identified in Table 2-2, the two groups of controls that have the potential to increase water demand from PAR 1402 are carbon adsorption and wet scrubbers. The removal of organic material from spent carbon from carbon adsorbers may involve the use of a steam stripping application. The steam/organic mixture is vented to a condenser where the mixture is cooled. The mixture can either be disposed of or the water can be separated from the organic mixture by decanting or distillation.

The absorption process involves the transfer of components from a gas stream into a liquid form. The choice of absorbent is dependent on the physical properties of the pollutants to be controlled. Water can be used as an absorbent media for soluble gases. There are typically two modes of operation for an absorption process: simple and reclaiming/recycling. The simple process uses a single-liquid-pass system, where the water containing the toxic emission is disposed of directly after exiting the absorber. The water absorbent would need to be replaced periodically. In the complex process, the toxic component is removed or stripped from the water, and the water is recirculated into the system. In order for an absorption process to function efficiently, a certain volume of the water/toxic solution must be removed at a steady rate. The portion that is removed, which is termed the wet scrubber blowdown, constitutes the wastewater component of the process. The water that is removed must also be replaced.

According to Table 2-2, 16 new wet scrubbers and carbon adsorption systems will be needed to comply with PAR 1402. For the purposes of this analysis, an average emission exhaust flowrates was evaluated to estimate potential water demand generated by the proposed amendments. The flowrate evaluated are 10,000 CFM (Table 2-11).

If all of the 16 APCDs are assumed to be in full twenty-four hours operation, it is assumed that the control equipment will be able to handle a flowrate of 10,000 CFM, as much as 165,000 gallons per day [0.17 million gallons per day (MMgal/day)] may be utilized. This incremental daily increase in water demand anticipated for PAR 1402 is negligible (5.22E-7%) compared to the total SCAQMD supply of 9.8 million acre-feet (MAF) or 3,193,344 million gallons for 2012. Further, this incremental increase in water demand does not exceed the SCAQMD’s significance threshold

of potable water of 262,820 gallons per day and total water of 5,000,000 gallons per day and, therefore, is not considered to be significant.

**Table 2-11 Wastewater Discharge Volumes/Freshwater Demand From Carbon Adsorption and Wet Scrubbing**

WASTEWATER STREAM TYPE	AVERAGE SYSTEM FLOWRATE
	10,000 CFM
Wet Scrubber blowdown (MMgal/day) <sup>a</sup>	0.039 - 0.214
Wet Scrubber sludge dewatering (MMgal/day) <sup>b</sup>	0.005
Carbon Adsorption stream stripping condense (MMgal/day) <sup>c</sup>	0.0004 – 0.0006
Total Wastewater discharge (MMgal/day) <sup>d</sup>	0.044 – 0.220

- a Assumes 0.75 - 3.7 gal min per 1,000 CFM recirculation rate, 10 percent blowdown, fourteen units.
- b Assumes wet scrubber dewatered sludge 20 percent solids, 90-98 percent control efficiency.
- c Assumes 3/8 - 1/2 gal water per pound VOC collected, eight units
- d Equal to additional freshwater demand.

PAR 1402 would not require the use of groundwater. The facilities use potable water that is treated in their respective on-site wastewater treatment, reused, and then directed to the sanitary sewer.

Therefore, it would not substantially deplete groundwater supplies, or interfere substantially with groundwater recharge, or the additional water usage from the affected facilities would be negligible. Therefore, impacts are less than significant.

**IX. c) & d) Less Than Significant Impact.** PAR 1402 will result in additional APCDs installed on equipment at existing commercial or industrial facilities. Since PAR 1402 will only affect existing facilities, it is not expected to have significant adverse effects on any existing drainage patterns, or cause an increase rate or amount of surface runoff water that would exceed the capacity of the facilities’ existing or planned storm water drainage systems.

**IX. e) & f) No Impact.** PAR 1402 will result in additional APCDs installed on equipment at existing commercial or industrial facilities. PAR 1402 does not include or require any new or relocated facilities to build structures that could be located in 100-year flood hazard areas or in an area where people or structures would be exposed to flooding as a result of levee or dam failure or inundation by seiche, tsunami or mudflow. Therefore, no impacts are anticipated.

**IX. i) Less Than Significant Impact.** Staff estimates the additional water discharge from the wet scrubbers and carbon adsorbers are expected to be 0.17 MMgal/day are from facilities that are capable of handling the waste water from these activities.

If PAR 1402 does exceed a facilities’ wastewater discharge limit, the POTW may deem that a secondary peak permit could be required to allow the discharge during non-peak hours. Significance thresholds for industrial wastewater discharge are determined by its impact to the affected sewer system. Therefore, based on the above analysis, there would be adequate capacity

to serve the PAR 1402 projected demand addition to the provider's existing commitments and less than significant impacts are anticipated.

Based upon these considerations, significant adverse hydrology and water quality impacts are not anticipated from PAR 1402. Further, since no significant impacts were identified for any of these issues, no mitigation measures are necessary or required.

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**X. LAND USE AND PLANNING.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Land use and planning impacts will be considered significant if the project conflicts with the land use and zoning designations established by local jurisdictions.

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**X. a) No Impact.** PAR 1402 does not require the construction of new facilities, and any physical effects that will result from PAR 1402, will occur at existing facilities located in commercial/industrial areas and would not be expected to go beyond existing boundaries. Therefore, no impacts are anticipated.

**X. b) No Impact.** There are no provisions in PAR 1402 that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by PAR 1402. All proposed construction activities are expected to occur within the confines of the existing facilities and would not affect in any way habitat conservation or natural community conservation plans, agricultural resources or operations, and would not create divisions in any existing communities. Further, no new development or alterations to existing land designations will occur as a result of the implementation of PAR 1402. Therefore, present or planned land uses in the region will not be affected as a result of implementing PAR 1402.

Based upon these considerations, significant land use planning impacts are not expected from the implementation of PAR 1402. Further, since no significant impacts were identified for any of these issues, no mitigation measures are necessary or required.

**XI. MINERAL RESOURCES.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Project-related impacts on mineral resources will be considered significant if any of the following conditions are met:

- The project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- The proposed project results in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**XI. a) & b) No Impact.** PAR 1402 does not result in new or relocated facilities, the proposed amendments are only adding APCDs to existing facilities. There are no provisions in PAR 1402 that would result in the loss of availability of a known mineral resource of value to the region and the residents of the state such as aggregate, coal, clay, shale, et cetera, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Based upon these considerations, significant mineral resource impacts are not expected from the implementation of PAR 1402. Since no significant mineral resource impacts were identified for any of these issues, no mitigation measures are necessary or required.

**XII. NOISE.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project result in:				
a) Exposure of persons to or generation of permanent noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport or private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria**

Impacts on noise will be considered significant if:

- Construction noise levels exceed the local noise ordinances or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three decibels (dBA) at the site boundary. Construction noise levels will be considered significant if they exceed federal Occupational Safety and Health Administration (OSHA) noise standards for workers.
- The proposed project operational noise levels exceed any of the local noise ordinances at the site boundary or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three dBA at the site boundary.

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**XII. a), b), & c) Less Than Significant Impact.** The existing noise environment at each of the affected facilities is typically dominated by noise from existing equipment onsite, vehicular traffic around the facilities, and trucks entering and exiting facility premises. Construction activities associated with implementing PAR 1402 may generate some noise associated with the use of construction equipment and construction-related traffic temporarily. Operators must comply with

their local noise ordinances for construction. However, noise from the implementation of PAR 1402 is not expected to produce noise in excess of current operations at each of the existing facilities. The operation of APCDs may add new sources of noise to each affected facility. However, control devices are not typically equipment that generate substantial amounts of noise. Nonetheless, for any noise that may be generated by the control devices, it is expected that each facility affected will comply with all existing noise control laws or ordinances. Further, Occupational Safety and Health Administration (OSHA) and California-OSHA (Cal/OSHA) have established noise standards to protect worker health. These potential noise increases are expected within the allowable noise levels established by the local noise ordinances for industrial areas, and thus are expected to be less than significant. Therefore, less than significant noise impacts are expected to result from the operation of PAR 1402.

**XII. d) Less Than Significant Impact.** PAR 1402 does not result in new or relocated facilities, the proposed amendments are only adding APCDs at existing facilities. However, the addition of new or modification of existing toxic control equipment would not expose people residing or working in the project area to the same degree of excessive noise levels associated with airplanes because APCDs are not typically noise generating equipment. All noise producing equipment must comply with local noise ordinances and applicable OSHA or Cal/OSHA workplace noise reduction requirements. Therefore, less than significant noise impacts are expected to occur at sites located within an airport land use plan, or within two miles of a public airport.

Based upon these considerations, significant noise impacts are not expected from the implementation of PAR 1402. Further, since no significant impacts were identified for any of these issues, no mitigation measures are necessary or required.

**XIII. POPULATION AND HOUSING.**

Would the project:	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Induce substantial growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts of the proposed project on population and housing will be considered significant if the following criteria are exceeded:

- The demand for temporary or permanent housing exceeds the existing supply.
- The proposed project produces additional population, housing or employment inconsistent with adopted plans either in terms of overall amount or location.

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**XIII. a) and b) No Impact.** PAR 1402 is not expected to involve the relocation of individuals, require new housing or commercial facilities, or change the distribution of the population. The operators of affected facilities who need to perform any construction activities to comply with PAR 1402 can draw from the large existing labor pool in the local southern California area. Further, it is not expected that the installation of new or the modification of existing toxic control equipment will require new employees during operation of the equipment. Human population within the jurisdiction of the SCAQMD is anticipated to grow regardless of implementing PAR 1402. As a result, no impacts either direct or indirect, on population growth or displacement of people is anticipated.

Based upon these considerations, no impacts on population and housing are expected from the implementation of PAR 1402. Since no significant population and housing impacts were identified for any of these issues, no mitigation measures are necessary or required.

**XIV. PUBLIC SERVICES.**

Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts on public services will be considered significant if the project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives.

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**XIV. a) & b) Less Than Significant Impact.** PAR 1402 does not result in new or relocated facilities, the proposed amendments are only adding APCDs at existing facilities. Implementation of PAR 1402 is expected to cause facility operators to install new or modify existing toxic emissions control devices, all the while continuing current operations at existing affected facilities. PAR 1402 may result in a greater demand for catalyst, scrubbing agents and other chemicals, which will need to be transported to the affected facilities to support the function of toxic emissions control equipment and stored onsite prior to use. As first responders to emergency situations, police and fire departments may assist local hazmat teams with containing hazardous materials, putting out fires, and controlling crowds to reduce public exposure to releases of hazardous materials. In addition, emergency or rescue vehicles operated by local, state, and federal law enforcement agencies, police and sheriff departments, fire departments, hospitals, medical or paramedic facilities, that are used for responding to situations where potential threats to life or property exist, including, but not limited to fire, ambulance calls, or life-saving calls, may be needed in the event of an accidental release or other emergency. While the specific nature or degree of such impacts is currently unknown, the affected facilities have existing emergency

response plans so any changes to those plans would not be expected to dramatically alter how emergency personnel would respond to an accidental release or other emergency. In addition, due to the low probability and unpredictable nature of accidental releases, PAR 1402 is not expected to increase the need or demand for additional public services (e.g., fire and police departments and related emergency services, et cetera) above current levels.

No new or physically altered governmental facilities would be needed, since PAR 1402 does not result in any new or relocated facilities. Therefore, less than significant impacts are anticipated.

**XIV. c) No Impact.** As noted in the previous “Population and Housing” discussion, PAR 1402 is not expected to induce population growth in any way because the local labor pool (e.g., workforce) is expected to be sufficient to accommodate any construction activities that may be necessary at affected facilities and operation of new or modified toxic emissions control equipment is not expected to require additional employees. Therefore, there will be no increase in local population and thus no impacts are expected to local schools or parks.

**XIV. d) No Impact.** PAR 1402 is expected to result in the use of new or modified add-on control equipment for toxic control. Besides permitting the equipment or altering permit conditions by the SCAQMD, there is no need for other types of government services. PAR 1402 would not result in the need for new or physically altered government facilities in order to maintain acceptable service ratios, response times, or other performance objectives. There will be no increase in population and, therefore, no need for physically altered government facilities.

Based upon these considerations, significant public services impacts are not expected from the implementation of PAR 1402. Since no significant public services impacts were identified for any of these issues, no mitigation measures are necessary or required.

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**XV. RECREATION.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment or recreational services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to recreation will be considered significant if:

- The project results in an increased demand for neighborhood or regional parks or other recreational facilities.
- The project adversely affects existing recreational opportunities.

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**XV. a) & b) No Impact.** As discussed earlier under the topic of “Population and Housing,” there are no provisions in PAR 1402 that would affect or increase the demand for or use of existing neighborhood and regional parks or other recreational facilities or require the construction of new or the expansion of existing recreational facilities that might have an adverse physical effects on the environment because PAR 1402 will not directly or indirectly increase or redistribute population. Based upon these considerations, including the conclusion of “no impact” for the topic of “Population and Housing,” significant recreation impacts are not expected from implementing PAR 1402. Since no significant recreation impacts were identified, no mitigation measures are necessary or required.

**XVI. SOLID/HAZARDOUS WASTE.**

Would the project:	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria**

The proposed project impacts on solid/hazardous waste will be considered significant if the following occurs:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**XVI. a) Less Than Significant Impact.** Landfills are permitted by the local enforcement agencies with concurrence from the California Department of Resources Recycling and Recovery (CalRecycle). Local agencies establish the maximum amount of solid waste which can be received by a landfill each day and the operational life of a landfill. PAR 1402 would generate minimal waste from the disposal of contaminated concrete and soils that is discussed in further detail in the following paragraphs.

Affected facilities may install control equipment or implement process changes that could increase the waste products in the form of liquid or solids, and operation of control equipment such as filters, carbon adsorption, and wet scrubbers could have solid waste impacts.

**Assumptions Used in the Solid Waste Analysis**

This analysis of solid waste impacts assumes that safety and disposal procedures required by various agencies in the state of California will provide reasonable precautions against the improper disposal of hazardous wastes in a municipal waste landfill. Because of state and federal requirements, some facilities are attempting to reduce or minimize the generation of solid and hazardous wastes by incorporating source reduction technologies to reduce the volume or toxicity of wastes generated, including improving operating procedures, using less hazardous or nonhazardous substitute materials, and upgrading or replacing inefficient processes.

### **Carbon Adsorption**

The amount of solid waste that may be generated by the carbon adsorption process would depend on the number of carbon adsorbers installed, the operating characteristics, and frequency of carbon replacement. Disposal of spent carbon could adversely affect solid waste disposal facilities because increased quantities of waste may be generated. In addition, spent carbon may be considered hazardous waste depending on the constituents present and their concentrations, which may require disposal in a Class I landfill.

Only six carbon adsorbers may be installed to comply with PAR 1402. The estimated spent carbon waste is 852 tons/yr<sup>9</sup> from those facilities installing carbon adsorbers to comply PAR 1402. It should be noted that the amounts of solid waste generated substantially overestimates solid waste impacts because most carbon is regenerated in a rotary kiln and reused. The rotary kiln typically consumes five percent of the carbon in the process, which has to be replaced.

### **Wet Scrubbing**

It is estimated that ten wet scrubbers may be installed as a control option to comply with the proposed amendments. Assuming a 98 percent control efficiency, wet scrubbing of all metal compounds would be expected to generate a maximum volume of 92 tons per year (9.2 tons per year per wet scrubber x 10 facilities) of hazardous solids and dewatered sludge. Based on the types of facilities that would install wet scrubbers, it is likely that this waste would be concentrated with metals and would most likely need to be disposed of as a hazardous waste in a Class I landfill.

### **Filtration**

Filtration includes usage of HEPA filters. All mixed metal compounds could be generated with the use of filtration controls at a 99.9 percent control rate. It is likely that the majority of the approximately 11.4 tons per year of minerals and silica (6 filtration systems x 1.9 tons per year per filter) that could potentially be generated by filtration devices would be used as land cover at a solid waste, Class II landfill. Otherwise, if traces of asbestos, etc. are found, the filter would need to be disposed in a Class I landfill.

Depending upon what type of control equipment is used, the total quantity of waste requiring disposal in a Class I landfill that may be generated from the disposal of spent carbon, minerals and metal compounds is 2.6 tons per day (or 955.4 tons per year) as shown in Table 2-12.

**Table 2-12 Total Solid Waste Generation**

<b>Control Type</b>	<b>Potential # APCDs</b>	<b>Annual Waste per Control Device (tons/year)</b>	<b>Total Waste Generated (tons/year)</b>
Carbon adsorption	6	142	852
Wet Scrubbing	10	9.2	92
Filtration	6	1.9	11.4
<b>TOTAL WASTE GENERATED FROM PROPOSED PROJECT</b>			<b>955.4 tons/yr or 2.6 tons/day</b>

Currently, there are three Class I landfills in California: Laidlaw Environmental in Westmoreland, Imperial County; Chemical Waste Management Corporation in Kettleman Hills, Kings County;

<sup>9</sup> Based on total emissions of 71 ton/yr for low and medium boiling point VOC and carbon replacement rate 2-lb carbon/lb VOC per year, assuming 5-year bed life, six permit units.

and Laidlaw Environmental, in Buttonwillow, Kern County. According to SCAQMD's 2012 AQMP, the total available capacity of each of these landfills ranges from 83,425 cubic yards (or 116,796 tons per day). With an annual disposal of 955.4 tons of carbon beds, filters, etc., the total solid/hazardous waste impact from PAR 1402 is about 0.0022 percent of the available Class I landfill capacity. The amount of hazardous waste generated by PAR 1402 will not require new Class I landfills and is not considered to be a substantial impact to existing landfill capacity. Therefore, potential hazardous waste impacts are considered less than significant.

**XVI.b) Less Than Significant Impact.** It is assumed that facility operators at the affected facilities comply with all applicable local, state, or federal waste disposal regulations. Implementing PAR 1402 is not expected to interfere with any affected facility's ability to comply with applicable local, state, or federal waste disposal regulations. Therefore, impacts are less than significant.

Based upon these considerations, significant adverse solid/hazardous waste impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

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**XVII. TRANSPORTATION/TRAFFIC.**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### **Significance Criteria**

Impacts on transportation/traffic will be considered significant if any of the following criteria apply:

- Peak period levels on major arterials are disrupted to a point where level of service (LOS) is reduced to D, E or F for more than one month.
- An intersection's volume to capacity ratio increase by 0.02 (two percent) or more when the LOS is already D, E or F.
- A major roadway is closed to all through traffic, and no alternate route is available.
- The project conflicts with applicable policies, plans or programs establishing measures of effectiveness, thereby decreasing the performance or safety of any mode of transportation.
- There is an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.
- The demand for parking facilities is substantially increased.
- Water borne, rail car or air traffic is substantially altered.
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.
- The need for more than 350 employees.
- An increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round trips per day.
- Increase customer traffic by more than 700 visits per day.

### **DISCUSSION**

As discussed earlier under the "Environmental Checklist and Discussion", there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

#### **XVII. a) & b) Less than Significant Impact**

##### ***Construction***

PAR 1402 is expected to require construction activities for control equipment. It has been estimated to need 9 delivery and/or disposal trucks and 12 construction worker trips on a peak construction day (during the fill phases) for the three facilities constructing at the same time. Construction is not expected to affect on-site traffic or parking. The additional 21 construction trips are less than the significance threshold of 350 round trips, therefore construction activities are not expected to cause a significance adverse impact to traffic or transportation.

##### ***Operation***

Waste products may be generated from the use of several types of control technologies. Wastes could include: spent carbon generated from the carbon adsorption process; spent metal catalysts from the catalytic oxidation process; solids and sludge from wet scrubbers; and dry solids from filtration controls. The majority of wastes will likely need to be transported to disposal or recycling facilities. The catalysts in catalytic oxidizers need to be replaced every few years so this potential waste product was considered to contribute to the waste transport impacts.

For a "worst case" analysis, it is assumed that for the 24 facilities that choose to install a control device to comply with PAR 1402, these facilities at any given day would generate an additional 3 truck trips per day in the entire district additional for delivery and disposal. These potential truck trips are not expected to significantly adversely affect circulation patterns on local roadways or the level of service at intersections near affected facilities. In addition, this volume of additional daily

truck traffic is negligible over the entire area of the district. Finally, the number waste disposal transport trips substantially overestimates the number of anticipated trips because owners/operators at affected facilities may use other types of add-on control equipment that do not generate wastes and the actual volume of wastes is expected to much less than estimated here, resulting in fewer truck trips per day.

**Table 2-13 Estimation of Maximum Daily Vehicle Trips**

<b>Phase</b>	<b>Worker Vehicles</b>	<b>Delivery/Disposal Trucks</b>
<b>Construction</b>	12/day	9 per day <sup>a</sup>
<b>Operation</b>	N/A	3 per day <sup>b</sup>

<sup>a</sup> A maximum of 12 worker vehicles and 9 delivery/disposal trucks per day were estimated from three affected facilities peak construction

<sup>b</sup> A maximum of 3 delivery/disposal trucks will travel in the District for the 24 Affected Facilities

**XVII. c) No Impact.** Compliance with PAR 1402 will not require operators of existing facilities to construct buildings or other structures that could interfere with flight patterns so the height and appearance of the existing structures are not expected to change. Therefore, implementation of PAR 1402 is not expected to adversely affect air traffic patterns. Further, PAR 1402 will not affect in any way air traffic in the region because it will not require transport of any materials by air.

**XVII. d) & e) No Impact.** PAR 1402 does not involve construction of any roadways or other transportation design features, so there would be no change to current roadway designs that could increase traffic hazards. Thus, PAR 1402 is not expected to substantially increase traffic hazards or create incompatible uses at or adjacent to the affected facilities. Emergency access at the affected facilities is not expected to be impacted by PAR 1402. Further, each affected facility is expected to continue to maintain their existing emergency access. Since PAR 1402 involves short-term construction activities and operational of control equipment is not expected to increase vehicle trips, PAR 1402 is not expected to alter the existing long-term circulation patterns. PAR 1402 is not expected to require a modification to circulation, thus, no long-term impacts on the traffic circulation system are expected to occur.

**XVII. f) No Impact.** The affected facilities would still be expected to comply with, and not interfere with adopted policies, plans, or programs supporting alternative transportation (e.g. bicycles or buses). Since all of PAR 1402 compliance activities would occur on-site, PAR 1402 would not hinder compliance with any applicable alternative transportation plans or policies.

Based upon these considerations, significant adverse transportation/traffic impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**DISCUSSION**

As discussed earlier under the “Environmental Checklist and Discussion”, there are no expected environmental impacts from PAR 1401 and the associated ~~Rule~~ PAR 1402 guidance documents, since they are administrative in nature and do not require or cause any physical damage to the environment. A discussion of impacts from PAR 1402 are discussed below.

**XVIII. a) Less than Significant Impact.** As discussed in the “Biological Resources” section, PAR 1402 are not expected to significantly adversely affect plant or animal species or the habitat on which they rely because any construction and operational activities associated with affected sources are expected to occur entirely within the boundaries of existing developed facilities in areas that have been greatly disturbed and that currently do not support any species of concern or the habitat on which they rely. PAR 1402 are not expected to reduce or eliminate any plant or animal species or destroy prehistoric records of the past.

**XVIII. b) Less than Significant Impact.** Based on the foregoing analyses, PAR 1402 would not result in significant adverse project-specific environmental impacts. Potential adverse impacts

from implementing PAR 1402 would not be "cumulatively considerable" as defined by CEQA Guidelines §15064(h)(1) for any environmental topic because there are no, or only minor incremental project-specific impacts that were concluded to be less than significant. Per CEQA Guidelines §15064(h)(4), the mere existing of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that PAR 1402's incremental effects are cumulative considerable. SCAQMD cumulative significant thresholds are the same as project-specific significance thresholds.

This approach was upheld by the Court in *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal. App. 4th 327, 334. The Court determined that where it can be found that a project did not exceed the South Coast Air Quality Management District's established air quality significance thresholds, the City of Chula Vista properly concluded that the project would not cause a significant environmental effect, nor result in a cumulatively considerable increase in these pollutants. The court found this determination to be consistent with CEQA Guidelines §15064.7, stating, "The lead agency may rely on a threshold of significance standard to determine whether a project will cause a significant environmental effect." The court found that, "Although the project will contribute additional air pollutants to an existing nonattainment area, these increases are below the significance criteria..." "Thus, we conclude that no fair argument exists that the Project will cause a significant unavoidable cumulative contribution to an air quality impact." As in *Chula Vista*, here the District has demonstrated, when using accurate and appropriate data and assumptions, that the project will not exceed the established South Coast Air Quality Management District significance thresholds. See also, *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal. App. 4th 899. Here again the court upheld the South Coast Air Quality Management District's approach to utilizing the established air quality significance thresholds to determine whether the impacts of a project would be cumulatively considerable. Thus, it may be concluded that the Project will not cause a significant unavoidable cumulative contribution to an air quality impact.

Therefore, there is no potential for significant adverse cumulative or cumulatively considerable impacts to be generated by PAR 1402 for any environmental topic.

**XVIII. c) Less than Significant Impact.** Based on the foregoing analyses, PAR 1402 is not expected to cause adverse effects on human beings for any environmental topic because the air quality impacts were determined to be less than the significance thresholds (See Section III-AQ), the energy demand, water demand and solid waste disposal can be met utilizing existing services (See Section VI-Energy, Section IX-Hydrology and Section XVI-Solid/Hazardous Waste) and the aesthetics, noise, hazards and public services will not be significantly impacted (See Section I-Aesthetics, Section VII-Hazards, Section XII-Noise, and Section XIV-Public Services).

As previously discussed in environmental topics I through XVIII, PAR 1402 has no potential to cause significant adverse environmental effects. Therefore, no further analysis or mitigation measures are required or necessary.

# APPENDICES

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## APPENDIX A

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### PROPOSED AMENDED RULES

In order to save space and avoid repetition, please refer to the latest version of the PARs 307.1, 1401, and 1402 located elsewhere in the October 7, 2016 Governing Board Package. The version of PARs 307.1, 1401, and 1402 that were circulated with the Draft EA during the 30-day public review and comment period from August 23, 2016 to September 22, 2016 were identified in Appendix A of the Draft EA as follows:

PAR 307.1 (07-19-2016)

PAR 1401 (07-19-2016)

PAR 1402 (07-19-2016)

Original hard copies of the Draft EA, which include the draft versions of PARs 307.1, 1401, and 1402 listed above, can be obtained through the SCAQMD Public Information Center at the Diamond Bar headquarters or by calling (909) 396-2039. In addition, the draft versions of PARs 307.1, 1401, and 1402 can be found in Appendix A of the Draft EA which can be accessed on the SCAQMD's website at: [http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/PAR307-1\\_1401\\_1402DEA.pdf?sfvrsn=4](http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/PAR307-1_1401_1402DEA.pdf?sfvrsn=4).

## **APPENDIX B**

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### **ASSUMPTIONS AND CALCULATIONS**

Table B-1 Summary

**Total On-Site for Three Facilities  
("worst-case")**

	<b>CO, lb/day</b>	<b>NOx, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>CO2e, ton/year</b>	<b>Total GHG Amortized over 30 years for 24 facilities (CO2e/yr)</b>
Grading/Site Preparation	34	76	<b>10.6</b>	<b>4.4</b>	8.2	0.1	47	
Paving	23	36	2.2	2.0	0.7	0.02	7	
Equipment Installation	<b>45</b>	<b>89</b>	4.3	3.9	<b>10.3</b>	<b>0.1</b>	<b>1243</b>	
								346
Significance Threshold	550	100	150	55	75	150	10,000	
Exceed Significance?	NO	NO	NO	NO	NO	NO	NO	

Table B-2 Grade/Site Summary

Grading/Site Preparation -		for Three Facilities							
Construction Schedule		10 days <sup>a</sup>							
Equipment Type <sup>a,b</sup>	No. of Equipment	hr/day	Crew Size per facility						
Rubber Tired Dozers	3	7.0	4						
Tractors/Loaders/Backhoes	3	7.0							
Construction Equipment Emission Factors									
Equipment Type <sup>c</sup>	CO	NOx	PM10	PM2.5	VOC	SOx	CO2	CH4	NO2
	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Rubber Tired Dozers	1.101	2.381	0.099	0.091	0.284	0.002	238	0.026	0.099
Tractors/Loaders/Backhoes	0.374	0.498	0.034	0.031	0.073	0.001	67	0.007	0.021
Fugitive Dust Bulldozer Parameters									
Vehicle Speed (mph) <sup>d</sup>	Vehicle Miles Traveled <sup>e</sup>								
3	63								
Fugitive Dust Material Handling									
Aerodynamic Particle Size Multiplier <sup>f</sup>	Mean Wind Speed <sup>g</sup>	Moisture Content <sup>h</sup>	Dirt Handled <sup>i</sup>				Dirt Handled <sup>j</sup>		
	mph		cy				lb/day		
0.35	10	7.9	2,730				136513 6,825,625		
Construction Vehicle (Mobile Source) Emission Factors <sup>k</sup>									
	CO	NOx	PM10	PM2.5	VOC	SOx	CO2	CH4	NO2
	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile
Automobile	4.12E-03	3.41E-04	1.04E-04	4.41E-05	4.50E-04	8.22E-06	0.73	2.01E-05	4.83E-06
Medium-Duty Truck	3.98E-03	1.81E-02	5.40E-04	3.85E-04	7.84E-04	3.64E-05	3.76	3.64E-05	2.56E-04
Number of Trips and Trip Length									
Vehicle	No. of One-Way Trips/Day	One-Way Trip Length (miles)							
Automobile	12	20							
Medium-duty Truck <sup>l</sup>	9	20							

Table B-2 Grade/Site Summary (continued)

Incremental Increase in Combustion Emissions from Construction Equipment									
Equation: Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Construction Emissions (lb/day)									
CO	NOx	PM10	PM2.5	VOC	SOx	CO2	CH4	NO2	Equipment Type
23.12	50.00	2.08	1.91	5.96	0.05	4,994	0.54	2.08	Rubber Tired Dozers
7.86	10.45	0.71	0.66	1.53	0.02	1,402	0.14	0.43	Tractors/Loaders/Backhoes
<b>31.0</b>	<b>60.5</b>	<b>2.8</b>	<b>2.6</b>	<b>7.5</b>	<b>0.1</b>	<b>6,396</b>	<b>0.7</b>	<b>2.5</b>	<b>Total</b>
Incremental Increase in Fugitive Dust Emissions from Construction Operations									
Equations:									
Grading <sup>m</sup> : PM10 Emissions (lb/day) = 0.60 x 0.051 x mean vehicle speed <sup>2.0</sup> x VMTx (1 - control efficiency)									
Material Handling <sup>n</sup> PM10 Emissions (lb/day) = (0.0032 x aerodynamic particle size multiplier x (wind speed (mph)/5) <sup>1.3</sup> /(moisture content) <sup>2.14</sup> x dirt handled (lb/day)/2,000 (lb/ton) (1 - control efficiency)									
Description	%	lb/day	lb/day	Control Efficiency	mitigated PM10	mitigated PM2.5 <sup>o</sup>			
Earthmoving	61	6.8	1.422						
Material Handling	61	0.54	0.113						
<b>Total</b>			<b>1.535</b>						
Incremental Increase in Combustion Emissions from Onroad Mobile Vehicles									
Equation: Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)									
CO	NOx	PM10	PM2.5	VOC	SOx	CO2	CH4	NO2	Vehicle
1.9114	8.6912	0.2594	0.1846	0.3764	0.0175	1,803	0.0175	0.1231	Automobiles
1.4336	6.5184	0.1945	0.1385	0.2823	0.0131	1,352	0.0131	0.0923	Medium Duty Trucks
<b>3.345</b>	<b>15.210</b>	<b>0.454</b>	<b>0.323</b>	<b>0.659</b>	<b>0.031</b>	<b>3,154</b>	<b>0.031</b>	<b>0.215</b>	<b>Total</b>

Table B-2 Grade/Site Summary (continued)

Total Incremental Emissions from Construction Activities						
CO	NOx	PM10	PM2.5	VOC	SOx	CO2
Sources	lb/day	lb/day	lb/day	lb/day	lb/day	metric ton/year
Emissions	34	76	10.6	4.4	8.2	0.098
Significance Threshold <sup>a</sup>	550	100	150	55	75	150
Exceed Significance?	NO	NO	NO	NO	NO	NO
<b>Notes:</b>						
Project specific data may be entered into shaded cells. Changing the values in the shaded cells will not affect the integrity of the worksheets. Verify that units of values entered match units for cell.						
Adding lines or entering values with units different than those associated with the shaded cells may alter the integrity of the sheets or produce incorrect results.						
a) Based on assumption that each bulldozer can move 35 cubic yards of soil per hour and one acre of area with a depth of 20 feet.						
b) Estimated construction equipment assumed to operate one eight-hour shift per day.						
c) Emission factors estimated using OFFROAD2011						
d) Caterpillar Performance Handbook, Edition 33, October 2003 Operating Speeds, p 2-3.						
e) Two bulldozers traveling three miles per hour for seven hours per day.						
f) USEPA, AP-42, Jan 1995, Section 13.2.4 Aggregate Handling and Storage Piles, p 13.2.4-3 Aerodynamic particle size multiplier for < 10 µm						
g) Mean wind speed - maximum of daily average wind speeds reported in 1981 meteorological data.						
i) Assuming 2730.25 cubic yards of dirt handled (4840 ft2 x 20 ft x yd3/27 ft3)/days)						
j) Dirt handled, lb/day = (2730.25 yd3 x 2,500 lb/yd3)						
k) Emission factors estimated using EMFAC2011 for the 2014 fleet year.						
l) Assumed 30 cubic yd truck capacity for 2730.25 cy of dirt [(2730.25 cy x truck/30 cy) = 9 one-way truck trips/day].						
m) USEPA, AP-42, July 1998, Table 11.9-1, Equation for Site Grading ≤ 10 µm						
n) USEPA, Fugitive Dust Background Document and Technical Information Document for Best Available Control Measures, Sept 1992, EPA-450/2-92-004, Equation 2-12						
o) Includes watering at least three times a day per Rule 403 (61% control efficiency)						
p) SCAQMD CEQA significance thresholds						

Table B-3 Paving Summary

Asphalt Paving of Foundation		for Three Facilities							
<b>Construction Schedule</b>	<b>8</b>	<b>days<sup>a</sup></b>							
<b>Equipment Type<sup>a</sup></b>	<b>No. of Equipment</b>	<b>hr/day</b>	<b>Crew Size per facility</b>						
Pavers	3	7.0	4						
Cement and Mortar Mixers	3	6.0							
Rollers	3	7.0							
<b>Construction Equipment Combustion Emission Factors</b>									
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>PM2.5</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>	<b>CH4</b>	
<b>Equipment Type<sup>b</sup></b>	lb/hr	lb/hr	lb/hr		lb/hr	lb/hr	lb/hr	lb/hr	
Pavers	0.526	0.810	0.056	0.052	0.143	0.001	78	0.013	
Cement and Mortar Mixers	0.042	0.055	0.002	0.002	0.009	0.000	7	0.001	
Rollers	0.401	0.616	0.042	0.039	0.091	0.001	67	0.008	
<b>Construction Vehicle (Mobile Source) Emission Factors<sup>c</sup></b>									
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>PM2.5</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>	<b>CH4</b>	
	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile
Automobile	4.12E-03	3.41E-04	1.04E-04	4.41E-05	4.50E-04	8.22E-06	0.73	2.01E-05	
Medium-Duty Truck	3.98E-03	1.81E-02	5.40E-04	3.85E-04	7.84E-04	3.64E-05	3.76	3.64E-05	
<b>Number of Trips and Trip Length</b>									
<b>Vehicle</b>	<b>No. of One-Way Trips/Day</b>	<b>One-Way Trip Length (miles)</b>							
Worker	12	20							
Delivery/Disposal Truck <sup>d</sup>	9	20							

Table B-3 Paving Summary (continued)

<b>Incremental Increase in Combustion Emissions from Construction Equipment</b>									
<b>Equation:</b> Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Construction Emissions (lb/day)									
	CO	NOx	PM10	PM2.5	VOC	SOx	CO2	CH4	
Equipment Type	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
Pavers	11.05	17.00	1.18	1.09	0.2	0.00	152	0.02	
Cement and Mortar Mixers	7.23	11.09	0.75	0.69	0.0	0.00	0	0.00	
Rollers	0.88	1.16	0.05	0.05	0.0	0.00	0	0.00	
<b>Total</b>	<b>19</b>	<b>29</b>	<b>1.99</b>	<b>1.83</b>	<b>0.19</b>	<b>0.00</b>	<b>152</b>	<b>0.02</b>	
<b>Incremental Increase in Combustion Emissions from Onroad Mobile Vehicles</b>									
<b>Equation:</b> Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)									
	CO	NOx	PM10	PM2.5	VOC	SOx	CO2	CH4	
Vehicle	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
Worker	1.978	0.164	0.0498	0.0212	0.2161	0.0039	349.6105	0.0096	
Delivery	1.434	6.518	0.1945	0.1385	0.2823	0.0131	1351.9159	0.0131	
<b>Total</b>	<b>3.412</b>	<b>6.682</b>	<b>0.2443</b>	<b>0.1596</b>	<b>0.4984</b>	<b>0.0170</b>	<b>1701.5264</b>	<b>0.0227</b>	
<b>Total Incremental Combustion Emissions from Construction Activities</b>									
Sources	CO	NOx	PM10	PM2.5	VOC	SOx	CO2eq		
Emissions	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	metric ton/year		
	23	36	2.2	2.0	0.7	0.0	6.8		
<b>Significance Threshold<sup>e</sup></b>	<b>550</b>	<b>100</b>	<b>150</b>	<b>55</b>	<b>75</b>	<b>150</b>			
<b>Exceed Significance?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>			
<b>Notes:</b>									
Project specific data may be entered into shaded cells. Changing the values in the shaded cells will not affect the integrity of the worksheets. Verify that units of values entered match units for cell. Adding lines or entering values with units different than those associated with the shaded cells may alter the integrity of the sheets or produce incorrect results.									
a) Estimated construction equipment assumed to operate one eight-hour shift per day.									
b) Emission factors estimated using OFFROAD2011									
c) Emission factors estimated using EMFAC2011 for the 2014 fleet year.									
d) Assumed three deliver truck trips per day.									
e) SCAQMD CEQA significance thresholds									

Table B-4 Installation Summary

APCD Installation for Three Facilities									
Construction Schedule 30 days									
Equipment Type <sup>a</sup>	No. of Equipment	hr/day	Crew Size per facility						
Cranes	9	4.0	4						
Forklifts	6	6.0							
Tractors/Loaders/Backhoes	6	8.0							
Construction Equipment Combustion Emission Factors									
Equipment Type <sup>b</sup>	CO	NOx	PM10	PM2.5	VOC	SOx	CO2	CH4	NO2
	lb/hr	lb/hr	lb/hr		lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Cranes	0.431	1.028	0.044	0.041	0.120	0.001	121	0.011	0.043
Forklifts	0.221	0.355	0.018	0.016	0.050	0.001	54	0.004	0.015
Tractors/Loaders/Backhoes	0.374	0.498	0.034	0.031	0.073	0.001	67	0.007	0.021
Construction Vehicle (Mobile Source) Emission Factors <sup>c</sup>									
	CO	NOx	PM10	PM2.5	VOC	SOx	CO2	CH4	NO2
	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile
Automobile	4.12E-03	3.41E-04	1.04E-04	4.41E-05	4.50E-04	8.22E-06	0.73	2.01E-05	4.83E-06
Medium-Duty Truck	3.98E-03	1.81E-02	5.40E-04	3.85E-04	7.84E-04	3.64E-05	3.76	3.64E-05	2.56E-04
Number of Trips and Trip Length									
Vehicle	No. of One-Way Trips/Day	One-Way Trip Length (miles)							
Worker	12	20							
Medium-duty Truck <sup>d</sup>	9	20							

Table B-4 Installation Summary (continued)

<b>Incremental Increase in Combustion Emissions from Construction (Off Road) Equipment</b>										
<b>Equation:</b> Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Construction Emissions (lb/day)										
	CO	NOx	PM10	PM2.5	VOC	SOx	CO2	CH4	NO2	
Equipment Type	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
Cranes	15.5	37.0	1.60	1.47	4.3	0.05	4,353	0.39	1.54	
Forklifts	8.0	12.8	0.64	0.59	1.79	0.02	1,957	0.16	0.53	
Tractors/Loaders/Backhoes	18.0	23.9	1.63	1.50	3.50	0.04	3,204	0.31	0.99	
<b>Total</b>	<b>41.5</b>	<b>73.7</b>	<b>3.9</b>	<b>3.6</b>	<b>9.6</b>	<b>0.11</b>	<b>9,514</b>	<b>0.87</b>	<b>3.06</b>	

<b>Incremental Increase in Combustion Emissions from Onroad Mobile Vehicles</b>										
<b>Equation:</b> Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)										
	CO	NOx	PM10	PM2.5	VOC	SOx	CO2	CH4	NO2	
Vehicle	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
Worker	1.91	8.7	0.259	0.185	0.376	1.75E-02	1,803	0.0175	0.1231	
Medium-Duty Truck	1.43	6.5	0.20	0.138	0.28	1.30E-02	1,352	0.013	0.092	
<b>Total</b>	<b>3.3</b>	<b>15.2</b>	<b>0.45</b>	<b>0.32</b>	<b>0.66</b>	<b>3.05E-02</b>	<b>3,154</b>	<b>0.031</b>	<b>0.215</b>	

<b>Total Incremental Combustion Emissions from Construction Activities</b>							
	CO	NOx	PM10	PM2.5	VOC	SOx	CO2eq
Sources	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	metric ton/year
Emissions	<b>45</b>	<b>89</b>	<b>4.3</b>	<b>3.9</b>	<b>10.3</b>	<b>0.1</b>	<b>1,243</b>
Significance Threshold <sup>c</sup>	<b>550</b>	<b>100</b>	<b>150</b>	<b>55</b>	<b>75</b>	<b>150</b>	
Exceed Significance?	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	

<b>Notes:</b>							
Project specific data may be entered into shaded cells. Changing the values in the shaded cells will not affect the integrity of the worksheets. Verify that units of values entered match units for cell. Adding lines or entering values with units different than those associated with the shaded cells may alter the integrity of the sheets or produce incorrect results.							
a) Estimated construction equipment assumed to operate one eight-hour shift per day.							
b) Emission factors estimated using OFFROAD2011							
c) Emission factors estimated using EMFAC2011 for the 2014 fleet year.							
d) Assumed three deliver truck trips per day.							
e) SCAQMD CEQA significance thresholds							

Table B-5 Operation Summary

Operational		for Three Facilities									
Automobile		lb/mile		lb/mile		lb/mile		lb/mile		lb/mile	
Medium-Duty Truck <sup>3</sup>		3.98E-03		1.81E-02		5.40E-04		3.88E-04		7.84E-04	
Automobile		4.12E-03		3.41E-04		1.04E-04		4.41E-05		4.50E-04	
Medium-Duty Truck <sup>3</sup>		3.98E-03		1.81E-02		5.40E-04		3.88E-04		7.84E-04	
Vehicle		No. of One-Way Trips/Day <sup>1</sup>		One-Way Trip Length <sup>2</sup> (miles)							
Worker		0		20							
Medium-Duty Truck		3		20							
Incremental Increase in Combustion Emissions from Onroad Mobile Vehicles											
Equation: Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)											
Vehicle		lb/day		lb/day		lb/day		lb/day		lb/day	
CO		NOx		PM10		PM2.5		VOC		SOx	
Automobile		0.00		0.0000		0.0000		0.000		0.00000	
Medium-Duty Truck		0.5		2.2		0.065		0.046		0.0044	
Total Incremental Emissions from Operational Activities											
Sources		lb/day		lb/day		lb/day		lb/day		metric ton/year	
CO		NOx		PM10		PM2.5		VOC		SOx	
CO2		NO		NO		NO		NO		NO	
Significance Threshold <sup>b</sup>		550		150		55		75		150	
Exceed Significance?		NO		NO		NO		NO		NO	
Notes:											
a) Emission factors estimated using EMFAC2011 for the 2016 fleet year.											
b) SCAQMD significance thresholds											

**Table B-6 Thermal Oxidizer Summary****Annual Emission Reporting Default Emission Factors for External Combustion Equipment**

Fuel Type (fuel unit)	Organic Gases, lb/mmscf	Rule 1147 Nitrogen Oxides, lb/mmbtu	Sulfur Oxides, lb/mmscf	Carbon Monoxide, lb/mmscf	Particulate Matter, lb/mmscf	CO <sub>2</sub> , lb/mmscf	N <sub>2</sub> O, lb/mmscf	CH <sub>4</sub> , lb/mmscf
Natural Gas/ Other Equipment	7	0.073	0.6	35	7.5	120,000	0.64000	2.3

Annual Emission Reporting (AER) defaulting emission factors from B1 external combustion equipment for all criteria pollutants exempt NO<sub>x</sub>.  
BACT= Rule 1147 NO<sub>x</sub> emissions limit was used.

CO<sub>2</sub>, N<sub>2</sub>O and CH<sub>4</sub> emission factors from AP-42 Table 1.4-2, July 1998

**Thermal Oxidizer Criteria Pollutant Emissions**

Natural Gas Rating, mmbtu/hr	Conversion, btu/scf	Natural Gas Usage, mmscf/hr	Op Time, hr/day	ROG, lb/day	NO <sub>x</sub> , lb/day	SO <sub>x</sub> , lb/day	CO, lb/day	PM, lb/day
2.44	1,050	0.00232	8	0.1	1.4	0.01	0.7	0.1

Natural gas rating based on engineering estimate.

**Thermal Oxidizer Greenhouse Gas Emissions**

Natural Gas Usage, mmscf/yr	CO <sub>2</sub> , metric ton/year	N <sub>2</sub> O, metric ton/year	CH <sub>4</sub> , metric ton/year	CO <sub>2</sub> e, metric ton/year
20.3	1,105	0.01	0.02	1,107

**Table B-7  
Construction Equipment Fuel Use (Off Road)**

**Grading/Site Preparation**

<b>Equipment Type</b>	<b>No. of Equipment</b>	<b>Op Time, hr/day</b>	<b>Fuel Economy, gal/hr</b>	<b>Fuel Used, gal/day</b>
Rubber Tired Dozers	3	7.0	5.2	109.2
Tractors/Loaders/Backhoes	3	7.0	1.9	39.9
<b>Total:</b>				<b>149.1</b>

**Paving**

<b>Equipment Type</b>	<b>No. of Equipment</b>	<b>Op Time, hr/day</b>	<b>Fuel Economy, gal/hr</b>	<b>Fuel Used, gal/day</b>
Pavers	1	7.0	2.8	19.6
Cement and Mortar Mixers	4	6.0	3.8	91.2
Rollers	1	7.0	1.6	11.2
Tractors/Loaders/Backhoes	1	7.0	1.9	13.3
<b>Total:</b>				<b>135.3</b>

**Equipment Installation**

<b>Equipment Type</b>	<b>No. of Equipment</b>	<b>Op Time, hr/day</b>	<b>Fuel Economy, gal/hr</b>	<b>Fuel Used, gal/day</b>
Cranes	3	4.0	3.52	42.24
Forklifts	2	6.0	0.96	11.52
Tractors/Loaders/Backhoes	2	8.0	1.9	30.4
<b>Total:</b>				<b>84.16</b>

**Table B-8  
Vehicle Fuel Use (On Road)  
Construction and Operation**

**Grading/Site Preparation**

<b>Vehicle</b>	<b>No. of One-Way, Trips/Day</b>	<b>One-Way Trip Length, miles</b>	<b>Fuel Economy, mpg</b>	<b>Fuel Used, gal/day</b>
Automobile	12	20	10	48
Medium-duty Truck	9	20	40	9

**Paving**

<b>Vehicle</b>	<b>No. of One-Way, Trips/Day</b>	<b>One-Way Trip Length, miles</b>	<b>Fuel Economy, mpg</b>	<b>Fuel Used, gal/day</b>
Automobile	12	20	10	48
Medium-duty Truck	9	20	40	9

**Equipment Installation**

<b>Vehicle</b>	<b>No. of One-Way, Trips/Day</b>	<b>One-Way Trip Length, miles</b>	<b>Fuel Economy, mpg</b>	<b>Fuel Used, gal/day</b>
Automobile	12	20	10	48
Medium-duty Truck	9	20	40	9

**Operational**

<b>Vehicle</b>	<b>No. of One-Way, Trips/Day</b>	<b>One-Way Trip Length, miles</b>	<b>Fuel Economy, mpg</b>	<b>Fuel Used, gal/day</b>
Medium-duty Truck	3	20	40	3

## APPENDIX C

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### ASSOCIATED RULE 1402 GUIDANCE DOCUMENTS

In order to save space and avoid repetition, please refer to the latest version of the associated Rule 1402 guidance documents located elsewhere in the October 7, 2016 Governing Board Package. The versions of the associated Rule 1402 guidance documents that were circulated with the Draft EA during the 30-day public review and comment period from August 23, 2016 to September 22, 2016 were identified in Appendix C of the Draft EA as Draft SCAQMD Public Notification Procedures for Facilities Under the Air Toxics “Hot Spots” Information and Assessment Act (AB 2588) and Rule 1402 – Updated July 2015, and Draft SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk Reduction Program. Original hard copies of the Draft EA, which include the draft versions of the associated Rule 1402 guidance documents listed above, can be obtained through the SCAQMD Public Information Center at the Diamond Bar headquarters or by calling (909) 396-2039. In addition, the associated Rule 1402 guidance documents along with the Draft EA can be accessed on the SCAQMD’s website at: [http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/PAR307-1\\_1401\\_1402DEA.pdf?sfvrsn=4](http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/PAR307-1_1401_1402DEA.pdf?sfvrsn=4).

**APPENDIX D**

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**COMMENT LETTER AND RESPONSE TO THE COMMENT LETTER**

## **INTRODUCTION**

A Draft EA was released for a 30-day public review and comment period from August 23, 2016 to September 22, 2016. The environmental analysis in the Draft EA concluded that the proposed project would not generate any significant adverse environmental impacts. The SCAQMD received one comment letter relative to the Draft EA during the public comment period.

The comment letter has been bracketed and numbered. Following the comment letter is SCAQMD staff's response.

Comment Letter #1



**PALA ENVIRONMENTAL DEPARTMENT**  
PALA BAND OF MISSION INDIANS  
PMB 50, 35008 Pala Temecula Road | Pala, CA 92059  
Phone 760-891-3510 | Fax 760-742-3189



August 24, 2016

South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
Attention: Jillian Wong, Ph.D.

Re: Notice of Completion of Draft Environmental Assessment – Proposed Amended Rule Changes

Dear Mrs. Wong,

Thank you for the notice referenced above. This letter constitutes our response on behalf of Robert Smith, Chairman of the Pala Band of Mission Indians.

At this time, the Pala Band has no objection to the action outlined in the notice as proposed. We reserve the right to comment in the future should there be modifications or if new information becomes available.

If you have any questions or comments, please contact Darold Wallick, Air Technician for the Pala Environmental Department, at [dwallick@palatribe.com](mailto:dwallick@palatribe.com) or 760-891-3540.

Sincerely,

Shasta C. Gaughen, PhD  
Environmental Director

} 1-1

THINK GLOBALLY | ACT TRIBALLY

Response to Comment Letter #1

Response to Comment 1-1:

Thank you for your comment. No changes to the Final EA and no further response to the comment are necessary.