

# **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

## **Final Environmental Assessment:**

## **Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities**

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## **Executive Officer**

Barry R. Wallerstein, D. Env.

## **Deputy Executive Officer Planning, Rule Development and Area Sources Philip Fine, Ph.D.**

**Assistant Deputy Executive Officer  
Planning, Rule Development and Area Sources**  
Jill Whynot

## **Planning and Rules Manager**

### **Planning, Rule Development and Area Sources**

**Author:** Jeff Inabinet Air Quality Specialist, CEQA

**Technical Assistance:** Tuyet-le Pham Air Quality Specialist

**Reviewed By:** Jillian Wong, Ph.D.  
Tracy Goss, P.E.  
Ruby Fernandez

Program Supervisor, CEQA  
Planning and Rules Manager  
Senior Deputy District Counsel

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County of San Bernardino

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BARRY R. WALLERSTEIN, D.Env.

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## PREFACE

This document constitutes the Final Environmental Assessment (EA) for Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities. The Draft EA was released for a 30-day public review and comment period from July 21, 2015 to August 19, 2015. No comment letters on the Draft EA were received during the public comment period. The environmental analysis in the Draft EA concluded that Proposed Amended Rule 1156 would not generate any significant adverse environmental impacts.

Minor modifications were made to the proposed amended rule subsequent to release of the Draft EA for public review. To facilitate identifying modifications to the Draft EA, added and/or modified text is underlined. Some of these rule modifications include: the elimination of a dust mitigation plan submittal prior to land disturbing activities; the extension of the effective date of the ambient hexavalent chromium fenceline standard; updated requirements associated with exceedances of the ambient hexavalent chromium concentration and associated compliance plan; clarified that compliance plan requirements would not be required for an exceedance where the facility demonstrates that it is not the primary cause of the measured exceedance; if exceeding the fenceline standard, the facility would not have to submit a compliance plan if it is required to submit or has an approved health risk assessment under Rule 1402; added provisions to specify that exceedances of the applicable ambient hexavalent chromium concentration after September 5, 2016 but before September 5, 2018 would not be considered to be a violation of the rule; streamlined requirements relative to cessation of hexavalent chromium monitoring after facility closure; clarified requirements related to the number of hexavalent chromium monitors required and sampling frequency; added definitions for Facility Closure and Primary Cause; updated and clarified the provisions associated with facility closure; and administrative corrections and clarifications. Staff has reviewed these minor rule modifications and concluded that they do not cause any CEQA impacts to be substantially worse or change any conclusions reached in the Draft EA. By analyzing the more stringent requirements of the previous version of the proposed amended rule, the Draft EA evaluated a “worst-case” impact scenario. Therefore, any potential adverse impacts from the currently proposed project are expected to be less than the potential adverse impacts evaluated in the Draft EA. As a result, these minor revisions do not require recirculation of the document pursuant to CEQA Guidelines §15088.5. Therefore, this document now constitutes the Final EA for Proposed Amended Rule 1156.

## **CHAPTER 1 - PROJECT DESCRIPTION**

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**Introduction**

**Affected Facilities**

**California Environmental Quality Act**

**Project Location**

**Project Objective**

**Project Background**

**Cement Manufacturing Overview**

**Project Description**

## **INTRODUCTION**

The California Legislature created the South Coast Air Quality Management District (SCAQMD) in 1977<sup>1</sup> as the agency responsible for developing and enforcing air pollution control rules and regulations in the South Coast Air Basin (Basin) and portions of the Salton Sea Air Basin and Mojave Desert Air Basin referred to herein as the District. By statute, the SCAQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance with all federal and state ambient air quality standards for the District<sup>2</sup>. Furthermore, the SCAQMD must adopt rules and regulations that carry out the AQMP<sup>3</sup>. The Final 2012 AQMP concluded that reductions in emissions of particulate matter (PM), oxides of sulfur (SOx), oxides of nitrogen (NOx), and volatile organic compounds (VOC) are necessary to attain the current state and national ambient air quality standards for ozone, and particulate matter with an aerodynamic diameter of 2.5 microns or less (PM2.5). Ozone, a criteria pollutant which has been shown to adversely affect human health, is formed when VOCs react with NOx in the atmosphere. VOCs, NOx, SOx (especially sulfur dioxide) and ammonia also contribute to the formation of PM10 and PM2.5.

The Basin is designated by the United States Environmental Protection Agency (EPA) as a non-attainment area for ozone and PM2.5 emissions because the federal ozone standard and the 2006 PM2.5 standard have been exceeded. For this reason, the SCAQMD is required to evaluate all feasible control measures in order to reduce direct ozone and PM2.5 emissions, including PM2.5 precursors, such as NOx and SOx. The Final 2012 AQMP sets forth a comprehensive program for the Basin to comply with the federal 24-hour PM2.5 air quality standard, satisfy the planning requirements of the federal Clean Air Act, and provide an update to the Basin's commitments towards meeting the federal 8-hour ozone standard. In particular, the Final 2012 AQMP contains a multi-pollutant control strategy to achieve attainment with the federal 24-hour PM2.5 air quality standard with direct PM2.5 and NOx reductions identified as the two most effective tools in reaching attainment with the PM2.5 standard. The 2012 AQMP also serves to satisfy the recent requirements promulgated by the EPA for a new attainment demonstration of the revoked 1-hour ozone standard, as well as to provide additional measures to partially fulfill long-term reduction obligations under the 2007 8-hour Ozone State Implementation Plan (SIP).

In addition to regulating criteria pollutants, state law specifies that air districts may regulate Toxic Air Contaminants (TACs). Specifically, Health and Safety Code §39656, 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 §44330) through Rule 1402.

To address potential air quality impacts and exposure to hexavalent chromium ( $\text{Cr}^{+6}$ ) after the closure of cement manufacturing facilities, and to ensure long-term air quality and protection, the SCAQMD is proposing revisions to Rule 1156. The currently proposed amendments include requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of  $\text{Cr}^{+6}$  monitoring stations, including the elimination of  $\text{Cr}^{+6}$  ambient monitoring under specific conditions.

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<sup>1</sup> The Lewis-Presley Air Quality Management Act, 1976 Cal. Stats., ch 324 (codified at Health and Safety Code, §§40400-40540).

<sup>2</sup> Health and Safety Code, §40460 (a).

<sup>3</sup> Health and Safety Code, §40440 (a).

The proposed amendments would also revise the Cr<sup>+6</sup> ambient air monitoring fence-line threshold as a result of the 2015 update to the Office of Environmental Health Hazard Assessment's (OEHHA) risk assessment guidelines. On June 5, 2015, the SCAQMD Governing Board amended the District's primary rules addressing toxic emissions (e.g. Rules 1401, 1401.1, 1402 and 212) to take into account the new OEHHA guidelines. This proposed amendment will ensure that PAR 1156 uses a risk assessment methodology that is consistent with the District's primary toxic rules. The new guidelines apply age sensitivity factors and multiple pathways of exposure, in addition to inhalation and cancer risk estimates to residential and sensitive receptors. Assuming a constant level of monitored Cr<sup>+6</sup>, the new OEHHA guidelines yield an approximately 3.87-fold increase in residential cancer risk in comparison to the previous guidelines.

The proposed amendments would therefore change the fence-line Cr<sup>+6</sup> ambient air limit from 0.7 ng/m<sup>3</sup> to 0.20 ng/m<sup>3</sup> (both levels are excluding background). The Cr<sup>+6</sup> ambient air monitoring background is currently 0.043 ng/m<sup>3</sup>, based on the average background concentrations observed at the Fontana and Rubidoux stations as part of the fourth Multiple Air Toxics Emissions Study (MATES IV). With this background level, the new effective limit for Cr<sup>+6</sup> will be 0.243 ng/m<sup>3</sup>. PAR 1156 also proposes an implementation schedule for the new fence-line limit phase-in.

PAR 1156 development is the result of a March 2009 Rule 1156 amendment Resolution in which the SCAQMD Governing Board directed staff to re-evaluate the need for, and the frequency of, Cr<sup>+6</sup> ambient monitoring after five years of data collection, and to establish a working group to develop a Facility Closure Air Quality Plan Option (Closure Plan).

## **AFFECTED FACILITIES**

Rule 1156 requires cement manufacturing facilities to comply with specific requirements applicable to various operations, as well as materials handling and transport at the facilities. Riverside Cement (RC) in Riverside and California Portland Cement Company (CPCC) in Colton are the two cement manufacturing facilities in the SCAQMD's jurisdiction subject to Rule 1156. Currently, both cement manufacturing facilities are non-operational regarding clinker production. RC and CPCC only process clinker or cement material imported from facilities outside the SCAQMD's jurisdiction.

## **CALIFORNIA ENVIRONMENTAL QUALITY ACT**

PAR 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities, is a discretionary action by a public agency, which has potential for resulting in direct or indirect changes to the environment and, 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 environmental assessment (EA) with no significant adverse impacts pursuant to its Certified Regulatory Program and SCAQMD Rule 110. 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.

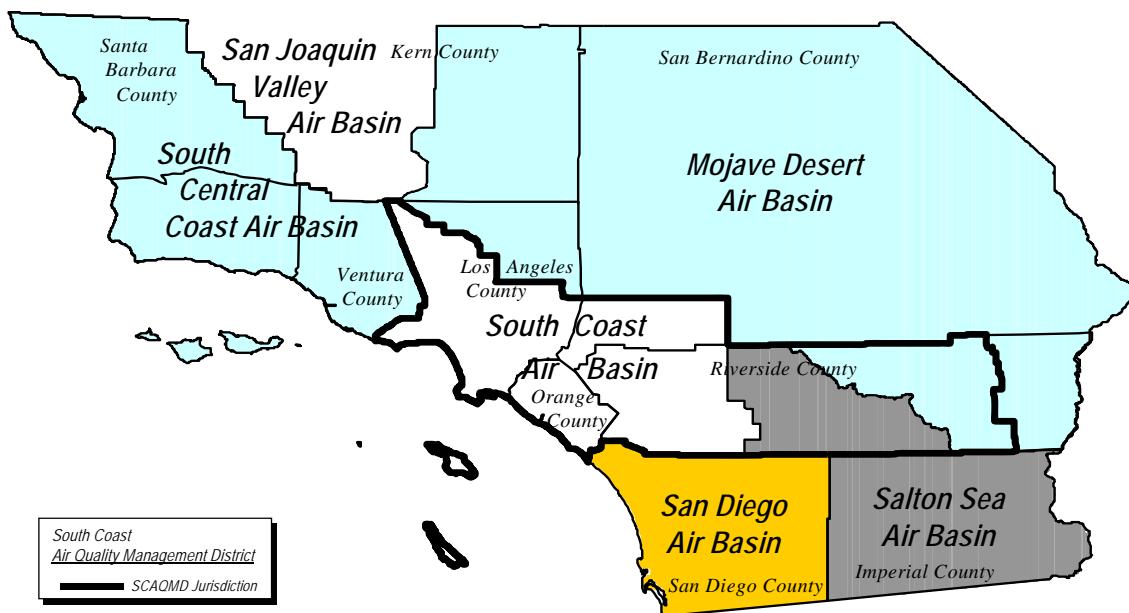
CEQA and Rule 110 require that potential adverse environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, the SCAQMD has prepared this final EA to address the potential adverse environmental impacts associated with the proposed project. The final EA is a public disclosure document intended to: (a) provide the lead agency, responsible agencies, decision makers and the general public with information on the environmental effects of the proposed project; and, (b) be used as a tool by decision makers to facilitate decision making on the proposed project.

SCAQMD's review of the proposed project shows that the proposed project would not have a significant adverse effect on the environment. Therefore, pursuant to CEQA Guidelines §15252 and 15126.6(f), no alternatives are proposed to avoid or reduce any significant effects because there are no significant adverse impacts, and pursuant to CEQA Guidelines §15126.4(a)(3), mitigation measures are not required for effects not found to be significant. The analysis in the form of the environmental checklist in Chapter 2 supports the conclusion of no significant adverse environmental impacts.

~~Comments received on the draft EA during the public comment period and responses to comments will be prepared and included in the Final EA for the proposed project.~~  
No comments were received on the draft EA during the public comment period.

## **PROJECT LOCATION**

The potentially affected facilities are located within the SCAQMD jurisdiction. The SCAQMD has jurisdiction over an area of approximately 10,743 square miles, consisting of the four-county South Coast Air Basin (Basin) (Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties), and the Riverside County portions of the Salton Sea Air Basin (SSAB) and Mojave Desert Air Basin (MDAB) (Figure 1-1).



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

## **PROJECT OBJECTIVE**

The objectives of the PAR 1156 are to:

- provide a mechanism for reduction of Cr<sup>+6</sup> monitoring requirements for existing facilities based on monitored data or a cessation of monitoring upon facility closure;
- revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the new OEHHA risk assessment guidelines;
- revise the criteria used to validate duplicate PM samples; and
- add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure.

## **PROJECT BACKGROUND**

Rule 1156 was originally adopted in November 2005. Rule 1156 implemented a portion of the 2003 AQMP control measure BCM-08 – Further Emission Reductions of Particulate Emissions from Cement Manufacturing Facilities. Cement manufacturing facilities are defined as any facility engaged in producing Portland cement or associated products. In March 2009, the rule was amended to further reduce particulate emissions and to address elevated ambient concentrations of the carcinogen, Cr<sup>+6</sup>, observed at the Rubidoux monitoring station in Western Riverside County as part of the third Multiple Air Toxics Emissions Study (MATES III). To protect the public from Cr<sup>+6</sup> exposure, the amendments included a threshold for Cr<sup>+6</sup> that was established to be 0.70 ng/m<sup>3</sup> (excluding background), based on 100-in-a-million fence-line cancer risk. Based on MATES III, a 0.16 ng/m<sup>3</sup> Cr<sup>+6</sup> background was derived based on the two-year sampling effort at nine fixed-site monitoring stations across the Basin (excluding the Rubidoux station). The Rubidoux station was excluded from the derivation as its Cr<sup>+6</sup> levels were likely influenced by the cement manufacturing facilities. Therefore, a fence-line effective limit was established at 0.860 ng/m<sup>3</sup>. The rule amendment also required additional control measures such as: clinker storage area protection, Cr<sup>+6</sup> ambient monitoring, and wind monitoring, with contingencies (i.e., clinker enclosure based on Cr<sup>+6</sup> results and PM10 monitoring in case of elevated concentrations). As part of the rule amendment Resolution in 2009, the Board directed staff to re-evaluate the need for, and the frequency of, Cr<sup>+6</sup> ambient monitoring after five (5) years of data collection, and to establish a working group to develop a Facility Closure Air Quality Plan Option (Closure Plan).

SCAQMD staff met with the working group in 2010 and 2011 to discuss the criteria for facility closure and conditions to potentially sunset Cr<sup>+6</sup> ambient monitoring. A draft closure plan was developed and presented to the Stationary Source Committee (SSC) in 2012, but was left as a living document since neither facility was producing clinker at the time and there was uncertainty regarding future cement manufacturing activities. Currently, both cement manufacturing facilities are still non-operational regarding clinker production. RC and CPCC only process clinker or cement material imported from facilities outside the SCAQMD's jurisdiction.

## **CEMENT MANUFACTURING OVERVIEW**

Portland cement is commonly manufactured through a dry method in which the combination of ground limestone rock and iron ore or other materials is fed to a cement kiln. As the materials move through the rotating kiln at a high temperature (about 2,700 degree Fahrenheit), some elements are driven off as gases or particulates and the remaining form a new substance called clinker. Clinker comes out of the kiln as hot, gray spheres about the size of large marbles. Clinker is cooled, ground and/or milled to a very fine product, and blended with small amounts of gypsum and fly ash to become cement, which is sold in packages or in bulk.



*Typical clinker nodules*

According to staff analysis in 2008 that included soil sampling, ambient air sampling, and emissions modeling, uncontrolled clinker material handling at cement manufacturing facilities associated with outdoor storage, transfer and re-entrained road dust were found to be the sources of the elevated ambient Cr<sup>+6</sup> concentrations in Rubidoux. Kilns and finish mills at cement manufacturing facilities can also influence the formation and emissions of Cr<sup>+6</sup>. Cr<sup>+6</sup> is a potent, known carcinogen, exposure to which could result in lung cancer, irritation and damage to the skin, eyes, nose, throat, and lung, asthma symptoms, and/or allergic skin reactions. Since clinker materials might also contain other toxics such as lead, arsenic, cadmium, and cobalt in addition to Cr<sup>+6</sup>, controlling emissions from these activities are essential.

Currently, both RC and CPCC are no longer producing clinker on-site. CPCC only imports cement from its Mojave facility for batch operations and has no immediate plans to restart one or

both of its kilns to manufacture clinker at the Colton facility. However, CPCC retains the capability to restart clinker production. RC previously manufactured clinker at the Riverside facility, but has not done so for many years. RC continues its cement manufacturing at this location by importing clinker from its Oro Grande facility for grinding, blending, and packaging in enclosed buildings vented to air pollution control devices.

## **PROJECT DESCRIPTION**

The SCAQMD is developing PAR 1156 to address potential air quality impacts and exposure to Cr<sup>+6</sup> after the closure of cement manufacturing facilities, and to ensure long-term air quality and protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The summary below and the revised rule language contained in Appendix A of this EA make up the project description used for this CEQA analysis. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. The proposed amendments would reduce permissible Cr<sup>+6</sup> fence-line levels to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines; reduce Cr<sup>+6</sup> monitoring requirements at existing facilities based either on compliance history, or potentially ceasing monitoring upon facility closure; and add provisions for a dust mitigation plan prior to any land disturbance activities occurring on a property after facility closure. A compliance plan with detailed descriptions of all feasible measures is required upon any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring after September 5, 2016.

## **CHAPTER 2 - ENVIRONMENTAL CHECKLIST**

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**Introduction**

**General Information**

**Environmental Factors Potentially Affected**

**Determination**

**Environmental Checklist and Discussion**

## **INTRODUCTION**

The environmental checklist provides a standard evaluation tool to identify a project's potential 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 Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive Diamond Bar, CA 91765
CEQA Contact Person:	Mr. Jeff Inabinet (909) 396-2453
Rule Contact Person	Ms. Tuyet-le Pham (909) 396-3299
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:	To address potential air quality impacts from the closure of cement manufacturing facilities and to ensure long-term air quality and protection, the South Coast Air Quality Management District (SCAQMD) is proposing revisions to Rule 1156. The currently proposed amendments are intended to minimize potential air quality impacts from cement facility closure and to ensure long-term air quality and public protection, while streamlining Cr <sup>+6</sup> ambient monitoring. The proposed amendments include requirements for owners/operators of the affected property before and after facility closure. The proposed amendments would reduce permissible Cr <sup>+6</sup> fence-line levels to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines; reduce Cr <sup>+6</sup> monitoring requirements at existing facilities based either on compliance history, or potentially ceasing monitoring upon facility closure; and add provisions for a dust mitigation plan prior to any land disturbance activities occurring on a property after facility closure.
Surrounding Land Uses and Setting:	Not applicable
Other Public Agencies Whose Approval is Required:	Not applicable

## **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The following environmental impact areas 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 impacts can be found following the checklist for each area.

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

## **DETERMINATION**

On the basis of this initial evaluation:

- I find the proposed project, 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.
- I find that although the proposed project 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 the proposed project MAY have a significant effect(s) on the environment, and an ENVIRONMENTAL ASSESSMENT will be prepared.
- I find that the proposed project 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 the proposed project 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: July 17, 2015

Signature: \_\_\_\_\_



Jillian Wong, Ph.D.  
Program Supervisor  
Planning, Rule Development, and Area Sources

## **ENVIRONMENTAL CHECKLIST AND DISCUSSION**

As discussed in Chapter 1, the main focus of PAR 1156 is to minimize potential air quality impacts from cement facility closure and ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. However, a compliance plan with detailed descriptions of all feasible measures is required upon any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring after September 5, 2016.

The key proposed amendments to the rule include the following:

- Criteria for facility closure relative to cement manufacturing operation: activities must be completely ceased (i.e., blending silo, kiln, clinker cooler, and clinker grinding/milling) and related permits must be surrendered or have expired and are no longer reinstatable;
- Condition for reducing Cr<sup>+6</sup> ambient monitoring stations at existing cement facilities:
  - Approval for reduced number of monitoring stations (minimum of one) may be obtained upon subsequent 12 consecutive months of demonstrating less than current Cr<sup>+6</sup> threshold (0.70 ng/m<sup>3</sup>, excluding background) after date of rule amendment;
  - Reversion to more frequent monitoring schedule for confirmed exceedances of the applicable threshold, considering wind and other relevant data;
- Effective September 5, 2016, ambient Cr<sup>+6</sup> concentrations from a 30-day or 90-day rolling average shall not exceed 0.20 ng/m<sup>3</sup> (excluding background). Prior to this date, the previous Cr<sup>+6</sup> threshold of 0.70 ng/m<sup>3</sup> (excluding background) is still in effect.
- A compliance plan with detailed descriptions of all feasible measures is required upon any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring after September 5, 2016.
- Criteria to validate duplicate samples:
  - PM10 concentrations of both samples must be below 0.002 grain/dscf; or
  - The difference between two samples shall be less than 35 percent of their average and the difference between the sample catches (normalized to the average sampling volume) shall be less than 3.5 milligrams;
- Requirements after facility closure:
  - Continued Cr<sup>+6</sup> ambient monitoring with possible sunset if no confirmed exceedance occurs during 12 consecutive months of monitoring after date of rule amendment;
  - Provisions for Cr<sup>+6</sup> ambient monitoring relocation and co-located monitoring and sampling by SCAQMD;

- Dust mitigation plan submittal and written approval from SCAQMD prior to land disturbance activities;
- Protocol for soil sampling and Cr<sup>+6</sup> ambient monitoring required before, during, and after land disturbance activities;
- Approval for reducing Cr<sup>+6</sup> ambient monitoring stations and/or frequency of soil sampling and Cr<sup>+6</sup> ambient monitoring may be obtained based on scope of activities;
- Description of control and/or stabilization measures required upon evidence of Cr<sup>+6</sup> in excess of the local background levels;
- Required information regarding dust mitigation measures; and
- Areas of property that are not contaminated may be excluded from the Dust Mitigation Plan, based on site-specific assessments identifying areas with and without Cr<sup>+6</sup> contamination; and

Once the new Cr<sup>+6</sup> threshold of 0.20 ng/m<sup>3</sup> becomes effective and there is a confirmed exceedance by the facility, a compliance plan with detailed descriptions of all feasible measures is required. Some of the potential measures may include additional controls on packing operations (i.e. installation of plastic shrouding), retrofitting of existing enclosures to ensure that fugitive emissions are not escaping, and application of water and/or chemical stabilizers for dust suppression. Potential impacts from these feasible measures are evaluated below in the appropriate environmental topic area.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>I. AESTHETICS.</b> 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 type="checkbox"/>	<input checked="" 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

**I. a), b), c) & d)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities on the property after facility closure. Therefore, there is no construction anticipated that would alter any views of the site as a result of PAR 1156. If the fenceline threshold is exceeded, the owner/operator of the affected property will have to submit a compliance plan which includes measures to reduce the on-site fugitive emissions.

The affected facilities are located in an existing highly industrialized commercial area that does not have any known scenic vistas or scenic resources. No construction is anticipated that would alter any views of the site in order to comply with PAR 1156. Therefore, PAR 1156 would not obstruct any scenic resources or degrade the existing visual character of any affected site, including but not limited to, trees, rock outcroppings, or historic buildings. Further, the proposed project would not involve the demolition of any existing buildings or facilities, require the

acquisition of any new land or the surrendering of existing land, or the modification of any existing land use designations or zoning ordinances. All new enclosures would be developed within the existing footprints of the affected facilities. Thus, the proposed project is not expected to degrade the visual character of any site or its surroundings from the existing visual character, affect any scenic vista, damage scenic resources, or create any new source of substantial light or glare.

Based upon these considerations, significant adverse aesthetics impacts are not anticipated and will not be further analyzed in this final EA. Since no significant adverse aesthetics impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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**II. AGRICULTURE AND FORESTRY RESOURCES.** 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 forestry 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**

**II. a), b), c) & d)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. There is no construction anticipated as a result of PAR 1156. Therefore, adoption of the proposed project would not result in any new construction of buildings or other structures that would convert farmland to non-agricultural use or conflict with zoning for agricultural use or a Williamson Act contract. The proposed project would not require converting farmland to non-agricultural uses because the potentially affected facilities are already completely developed. For the same reasons, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use.

Based upon these considerations, significant adverse agricultural and forestry resource impacts are not anticipated and will not be further analyzed in this final EA. Since no significant agriculture and forestry resource impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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### **III. AIR QUALITY AND GREENHOUSE GAS EMISSIONS.**

Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?
- b) Violate any air quality standard or contribute to an existing or projected air quality violation?

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

### Air Quality Significance Criteria

To determine whether or not air quality impacts from adopting and implementing the proposed project are significant, impacts will be evaluated and compared to the criteria in Table 2-1. The project will be considered to have significant adverse air quality impacts if any one of the thresholds in Table 2-1 are equaled or exceeded.

To determine whether or not greenhouse gas emissions from the proposed project may be significant, impacts will be evaluated and compared to the 10,000 MT CO<sub>2</sub>/year threshold for industrial sources.

**TABLE 2-1**  
**SCAQMD Air Quality Significance Thresholds**

Mass Daily Thresholds <sup>a</sup>		
Pollutant	Construction <sup>b</sup>	Operation <sup>c</sup>
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (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)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO2eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants <sup>d</sup>		
NO2  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)	
PM10  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 $\mu\text{g}/\text{m}^3$	
PM2.5  24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>e</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
SO2  1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 <sup>th</sup> percentile) 0.04 ppm (state)	
Sulfate  24-hour average	25 $\mu\text{g}/\text{m}^3$ (state)	
CO  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)	
Lead  30-day Average Rolling 3-month average Quarterly average	1.5 $\mu\text{g}/\text{m}^3$ (state) 0.15 $\mu\text{g}/\text{m}^3$ (federal) 1.5 $\mu\text{g}/\text{m}^3$ (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 CO2eq = metric tons per year of CO2 equivalents               $>$  = greater than

**III. a), b) and f)** Attainment of the state and federal ambient air quality standards protects sensitive receptors and the public in general from the adverse effects of criteria pollutants which are known to have adverse human health effects. The 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 the 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, the SCAQMD is required to attain the state and federal ambient air quality standards for all criteria pollutants.

The main focus of PAR 1156 is to minimize potential air quality impacts from cement facility closure and ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. However, a compliance plan with detailed descriptions of all feasible measures is required upon any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring after September 5, 2016.

### **Construction Impacts**

PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. A compliance plan with detailed descriptions of all feasible measures is required upon any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring after September 5, 2016. Potential measures in the compliance plan could include the installation of plastic shrouding around bagging operations, the partitioning of active bagging operations from the finished product storage areas, and the installation of plastic door flaps to prevent the escape of fugitive dust.

The construction-related activities attributable to installing this type of limited control equipment would be conducted using predominantly small, hand held tools, since most of this equipment is manufactured off-site and brought to the location. For the purposes of this analysis, construction activities undertaken to install this limited type of control equipment are anticipated to entail the use of hand held equipment by small construction crews to cut, fit and affix plastic shrouding/partitioning where necessary. Criteria pollutant emissions were calculated for all on-road vehicles transporting workers, vendors, and material delivery associated with the limited control equipment. Table 2-2 presents the peak daily construction emissions associated with the installation of shrouding/partitioning materials. Construction emissions calculations are provided in Appendix B.

**Table 2-2**  
**Peak Daily Construction Emissions Due to Installation of Shrouding / Partitioning Materials**

<b>PEAK CONSTRUCTION</b>	<b>VOC</b>	<b>CO</b>	<b>NOx</b>	<b>SOx</b>	<b>PM10</b>	<b>PM2.5</b>
	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day
Total Project Emissions	0.69	4.60	4.55	0.01	0.26	0.21
SCAQMD CEQA SIGNIFICANCE THRESHOLD	75	550	100	150	150	55
SIGNIFICANT?	NO	NO	NO	NO	NO	NO

The construction-related emissions attributable to installing this type of limited control equipment do not exceed SCAQMD peak daily construction emission significance thresholds.

#### **Operational Impacts- Criteria Pollutants**

The two affected facilities are currently required to apply chemical stabilizers to the properties twice per year, per Rule 1156. If the new Cr<sup>+6</sup> ambient air monitoring fence-line threshold is exceeded, additional applications of chemical soil stabilizers may be required at the property, including any areas where uncovered piles of material are located on-site. For a conservative approach, it was estimated that each affected facility may be required to apply chemical soil stabilizers an additional two times per year. Also, additional Cr<sup>+6</sup> sampling requirements will require the collection and delivery of samples to a laboratory for analysis. The sprayer truck emissions associated with the additional soil stabilizer applications and the sample collection and laboratory delivery vehicle emissions are presented in Table 2-3. Operational emissions calculations are provided in Appendix C.

**Table 2-3**  
**Peak Daily Operational Emissions Due to Additional Chemical Soil Stabilizer Applications and Sample Collection / Delivery**

<b>PEAK DAILY OPERATION</b>	<b>VOC</b>	<b>CO</b>	<b>NOx</b>	<b>SOx</b>	<b>PM10</b>	<b>PM2.5</b>
	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day
Total Project Emissions	1.36	7.06	10.35	0.02	0.44	0.43
SCAQMD CEQA SIGNIFICANCE THRESHOLD	55	550	55	150	150	55
SIGNIFICANT?	NO	NO	NO	NO	NO	NO

The operational-related emissions attributable to additional soil stabilizer applications and sample collection/delivery do not exceed SCAQMD peak daily operational emissions significance thresholds.

#### **Operational Impacts- Toxic Air Contaminants**

In assessing potential impacts from the adoption of proposed rules and amendments, SCAQMD staff not only evaluates the potential air quality benefits, but also determines potential health risks associated with implementation of the proposed rules and amendments.

Adoption of the proposed rule would establish procedures to reduce Cr<sup>+6</sup> emissions from the affected facilities even after facility closure. There are no provisions in the rule that would

generate any toxic emissions. As a result, there will be no increase in toxic air contaminant emissions due to the proposed project.

In summary, because emissions from this project would not exceed any SCAQMD thresholds for construction or operations, the proposed project will have no impact on our ability to implement the AQMP, no impact on any air quality standards, and no impact on any rules or requirements that could significantly impact air quality.

**III. c)** 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 or EIR. 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>4</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 implementing the proposed project would not exceed air quality significance thresholds (Table 2-1); therefore, based on the above discussion, cumulative impacts are not expected to be significant for air quality. Therefore, potential adverse impacts from the proposed project 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 existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulative considerable.

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<sup>4</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>.

**III. d)** Affected facilities are not expected to increase exposure by sensitive receptors to substantial pollutant concentrations from the implementation of PAR 1156 for the following reasons: 1) the proposed monitoring requirements and compliance plan will help reduce potential toxic exposure by sensitive receptors; 2) there are no provisions in the proposed rule that would cause an affected facility to generate any new or increased toxic emissions; and 3) there will be no additional electrical generation facilities needed as a result of the adoption of the proposed project (note: there will be a minimal additional need for power, but the demand, according to the power generators, can be met with existing systems). Therefore, significant adverse air quality impacts to sensitive receptors are not expected from implementing the proposed project.

**III. e)** The main objective of the proposed rule is to establish procedures to reduce Cr<sup>+6</sup> emissions from the affected facilities even after facility closure. Therefore, no significant odor impacts are expected to result from implementing the proposed project, as no odorous compounds are generated by any proposed project activities.

**III. g) & h)** Changes in global climate patterns have been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, recently attributed to accumulation of GHG emissions in the atmosphere. GHGs trap heat in the atmosphere, which in turn heats the surface of the Earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through the combustion of fossil fuels (i.e., fuels containing carbon) in conjunction with other human activities, appears to be closely associated with global warming.<sup>5</sup> State law defines GHG to include the following: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>) (HSC §38505(g)). The most common GHG that results from human activity is CO<sub>2</sub>, followed by CH<sub>4</sub> and N<sub>2</sub>O.

GHGs and other global warming pollutants are often perceived as solely global in their impacts because increasing emissions anywhere in the world contributes to climate change anywhere in the world. However, a study conducted on the health impacts of CO<sub>2</sub> "domes" that form over urban areas shows they can cause increases in local temperatures and local criteria pollutants, which have adverse health effects.<sup>6</sup>

The analysis of GHGs is a different analysis than the analysis of criteria pollutants for the following reasons. For criteria pollutants, the significance thresholds are based on daily emissions because attainment or non-attainment is primarily based on daily exceedances of applicable ambient air quality standards. Further, several ambient air quality standards are based on relatively short-term exposure effects on human health (e.g., one-hour and eight-hour standards). Since the half-life of CO<sub>2</sub> is approximately 100 years, for example, the effects of GHGs occur over a longer term which means they affect the global climate over a relatively long

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<sup>5</sup> Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.). 2007. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, 2007. Cambridge University Press.

[http://www.ipcc.ch/publications\\_and\\_data/ar4/wg1/en/contents.html](http://www.ipcc.ch/publications_and_data/ar4/wg1/en/contents.html)

<sup>6</sup> Jacobsen, Mark Z. "Enhancement of Local Air Pollution by Urban CO<sub>2</sub> Domes," Environmental Science and Technology, as describe in Stanford University press release on March 16, 2010 available at: <http://news.stanford.edu/news/2010/march/urban-carbon-domes-031610.html>.

time frame. As a result, the SCAQMD's current position is to evaluate the effects of GHGs over a longer timeframe than a single day (e.g., annual emissions). GHG emissions are typically considered to be cumulative impacts because they contribute to global climate effects.

On December 5, 2008, the SCAQMD adopted an interim CEQA GHG Significance Threshold for projects where SCAQMD is the lead agency (SCAQMD, 2008). This interim threshold is set at 10,000 metric tons of CO<sub>2</sub> equivalent emissions (MTCO<sub>2</sub>eq) per year. Projects with incremental increases below this threshold will not be deemed to be cumulatively considerable.

The Program EIR for the 2012 AQMP concluded that implementing the control measures in the 2012 AQMP would provide a comprehensive ongoing regulatory program that would reduce overall GHGs emissions in the District.

GHG emissions were calculated for all on-road vehicles transporting workers, vendors, and material delivery associated with the limited control equipment (plastic shrouding/partitioning) required by the proposed project. Additionally, GHG emissions were calculated for additional operational requirements (application of soil stabilizers and additional monitoring sample collection/delivery) from the proposed project. Table 2-4 provides the total construction CO<sub>2</sub>E emissions that could occur as a result of the proposed project. Detailed GHG calculations can be found in Appendices B and C. As shown in Table 2-4, GHG emissions generated by the construction and operational activities are expected to be relatively small, much less than 10,000 metric tons per year (SCAQMD's GHG significance threshold), and, therefore, not significant.

**Table 2-4**  
**Overall CO<sub>2</sub> Equivalent (eq) Increases Due to Construction and Operational Activities**  
**(metric tons/year)<sup>1</sup>**

	<b>CO<sub>2</sub></b>	<b>CH<sub>4</sub></b>	<b>CO<sub>2</sub>eq</b>
<b>Annual CO<sub>2</sub>eq Emission Increases Due to:</b>	lb/day	lb/day	MT/year
Proposed Construction Activities	1,393	0.05	1.27
Proposed Operational Activities	2,182	0.12	1.99
	<b>Total</b>		<b>3.26</b>

<sup>1</sup> 1 metric ton = 2,205 pounds

Since the proposed project is not expected to generate significant construction or operation-related GHG emissions, cumulative GHG adverse impacts from the proposed project are not considered significant or cumulatively considerable.

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

Indirect GHG and criteria pollutant 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 at their maximum permitted capacity 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) demonstrated that there is not likely to be increased electricity consumption from the proposed rule.

Under the SCAQMD Regional Clean Air Incentives Market (RECLAIM) program (that regulates NOx and SOx emissions), EGFs were provided annual allocations of NOx and SOx emissions that typically decline annually. However, the proposed project does require an increase in energy generation and any increase in emissions from generating additional energy (See Section VI. Energy for impacts) from the EGFs would be required to offset any potential NOx and SOx emission increases under the RECLAIM program and other pollutants under the New Source Review Project. Thus, air quality impacts from energy generation are anticipated to be to less than significant impacts.

### **Conclusion**

Based on the preceding evaluation of potential air quality impacts, SCAQMD staff has concluded that the proposed project does not have the potential to generate significant adverse air quality impacts. Since no significant adverse air quality and greenhouse gases impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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### **IV. BIOLOGICAL RESOURCES.**

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"/> |

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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) Conflicting 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**

**IV. a), b), c), & d)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated outside of existing building footprints as a result of PAR 1156. The biological resources have already been disturbed or removed at the existing facilities. As a result, the proposed project would not directly or indirectly affect any new or existing species identified as a candidate, sensitive or special status species, riparian habitat, federally protected wetlands, or migratory corridors. For this same reason, the proposed project is not expected to adversely affect special status plants, animals, or natural communities.

**IV. e) & f)** The proposed project would not conflict with local policies or ordinances protecting biological resources or local, regional, or state conservation plans because it would not cause new development. All existing facilities are already developed and the proposed project will not result in the need for construction. Additionally, the proposed project would not conflict with any Habitat Conservation Plan, Natural Community Conservation Plan, or any other relevant habitat conservation plan for the same reason identified in Item IV. a), b), c), and d) above. Likewise, the proposed project would not in any way impact wildlife or wildlife habitat.

Based upon these considerations, significant adverse biological resources impacts are not anticipated and will not be further analyzed in this final EA. Since no significant adverse biological resources impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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**V. CULTURAL RESOURCES.** 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 or cultural significance to a community or ethnic or social group.
- Unique paleontological resources are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

## **Discussion**

**V. a), b), c), & d)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated as a result of PAR 1156. Furthermore, all existing affected facilities have already been developed and would not require disturbing native soils that may contain cultural resources.

Since no activities requiring native soil disturbance would be associated with the implementation of the proposed project, no impacts to historical or cultural resources are anticipated to occur. Further, the proposed project is not expected to require any major physical changes to the environment, which may disturb paleontological or archaeological resources or disturb human remains interred outside of formal cemeteries.

**V. e)** The proposed project is not expected to require physical changes to a site, feature, place, cultural landscape, sacred place or object with cultural value to a California Native American Tribe. Furthermore, the proposed project is not expected to result in a physical change to a resource determined to be eligible for inclusion or listed in the California Register of Historical Resources or included in a local register of historical resources. For these reasons, the proposed project is not expected to cause any substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074.

It is important to note that as part of releasing this CEQA document for public review and comment, the SCAQMD also provided a formal notice of the proposed project to all California Native American Tribes (Tribes) that requested to be on the Native American Heritage Commission's (NAHC) notification list per Public Resources Code §21080.3.1 (b)(1). The NAHC notification list provides a 30-day period during which a Tribe may respond to the formal notice, in writing, requesting consultation on the proposed project.

In the event that a Tribe submits a written request for consultation during this 30-day period, the SCAQMD will initiate a consultation with the Tribe within 30 days of receiving the request in accordance with Public Resources Code §21080.3.1 (b). Consultation ends when either: 1) both parties agree to measures to avoid or mitigate a significant effect on a Tribal Cultural Resource and agreed upon mitigation measures shall be recommended for inclusion in the environmental document [see Public Resources Code §21082.3 (a)]; or, 2) either party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached [see Public Resources Code §21080.3.2 (b)(1)-(2) and §21080.3.1 (b)(1)].

Based upon these considerations, significant adverse cultural resources impacts are not expected from implementing the proposed project and will not be further assessed in this final EA. Since no significant cultural resources impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>VI. ENERGY.</b> 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 and mineral 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**

**VI. a) & e)** The proposed project 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 1156 is not expected to conflict with adopted energy conservation plans because existing affected facilities would be expected to continue implementing any existing energy conservation plans.

The proposed project is not expected to cause new development outside of the footprint of the affected facilities. 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.

As a result, the proposed project 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)** There is not expected to be an increase in electricity consumption associated with the continued ambient air monitoring, because fenceline monitors will likely be battery powered and are already in use. Diesel fuel would be consumed by trucks delivering the plastic shrouding / partitioning materials to the facilities and gasoline fuel would be consumed by the workers' vehicles installing control materials and trips required to collect the samples and to send to the lab for analysis. The following sections evaluate the various forms of energy sources affected by the proposed project.

**Petroleum Fuels:** During the construction phases, diesel and gasoline fuel will be consumed in delivery trucks and construction workers' vehicles traveling to and from the two affected sites. To estimate "worst-case" energy impacts associated with the construction phase for the proposed project, the SCAQMD assumed that shrouding / partitioning material would be installed at both affected facilities simultaneously. The details of the construction scenarios are included in Appendix B.

To estimate construction workers' fuel usage per commute round trip, the SCAQMD assumed that workers' vehicles would get 20 miles to the gallon and would travel 50 miles round trip to and from the construction site in one day. Table 2-5 lists the projected energy impacts associated with the construction and installation at the two affected facilities at any given time.

**Table 2-5**  
**Total Projected Fuel Usage for Construction Activities**

Overall Construction Activity	Equipment Type	Total Diesel Fuel Use (gal)	Total Gasoline Fuel Use (gal)
Diesel	Heavy-Heavy Duty Delivery Truck	26.67	N/A
Gasoline	Mixed Passenger Worker Vehicle	N/A	50

\* Assume that delivery trucks use diesel and get 15 miles/gallon traveling 100 miles roundtrip; 2 locations

\*\* Assume that construction workers' commute vehicles use gasoline and get 20 mi/gal and round trip length is 50 miles/phase.

Additionally, diesel fuel will be used by the spraying trucks used to apply additional soil stabilizers and gasoline fuel will be consumed in workers' vehicles operating the spraying trucks and collecting/delivering additional samples. The details of the operational scenario are included in Appendix C. Table 2-6 lists the projected energy impacts associated with operational activities required by the proposed project.

**Table 2-6**  
**Total Projected Fuel Usage for Operational Activities**

Overall Construction Activity	Equipment Type	Total Diesel Fuel Use (gal)	Total Gasoline Fuel Use (gal)
Diesel	Heavy-Heavy Duty Spraying Truck	79.04	N/A
Gasoline	Mixed Passenger Worker Vehicle-Spraying Truck Operator	N/A	10
Gasoline	Mixed Passenger Worker Vehicle-Sample Collection / Delivery	N/A	10

\* Assume that spraying vehicle use diesel and operate 8 hours/day (2 facilities).

\*\* Assume that construction workers' commute vehicles use gasoline and get 20 mi/gal and round trip length is 50 miles/phase.

Based on the above information, the proposed project is not expected to generate significant adverse energy resources impacts and will not be discussed further in this final EA. Since no significant energy impacts were identified, no mitigation measures are necessary or required.

Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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**VII. GEOLOGY AND SOILS.** Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - 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"/> |
| <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

**VII. a)** Southern California is an area of known seismic activity. Structures must be designed to comply with the Uniform Building Code Zone 4 requirements if they are located in a seismically active area. The local city or county is responsible for assuring that a proposed project complies with the Uniform Building Code as part of the issuance of the building permits 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 goal of the code is to provide structures that will: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage but with some non-structural damage; and 3) resist major earthquakes without collapse but with some structural and non-structural damage.

The Uniform Building Code bases seismic design on minimum lateral seismic forces (“ground shaking”). The Uniform Building Code requirements operate on the principle that providing appropriate foundations, among other aspects, helps to protect buildings from failure during earthquakes. The basic formulas used for the Uniform Building Code seismic design require determination of the seismic zone and site coefficient, which represent the foundation conditions at the site. Accordingly, buildings and equipment at existing facilities affected by PAR 1156 are likely to conform with the Uniform Building Code and all other applicable state codes in effect at the time they were constructed.

PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment’s (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated as a result of PAR 1156. Therefore, no major change in geological existing setting is expected. Consequently, the proposed project is not expected to expose persons or property to new geological hazards such as earthquakes, landslides, mudslides, ground failure, or other natural hazards. As a result, substantial exposure of people or structure to the risk of loss, injury, or death involving seismic-related activities is not anticipated and will not be further analyzed in this final EA.

**VII. b), c), d) & e)** Since the proposed project would affect two existing facilities, it is expected that the soil types present at the affected facilities that are susceptible to expansion or liquefaction would be considered part of the existing setting. Implementation of PAR 1156 would not require construction outside of building footprints; therefore, new subsidence impacts are not anticipated since no major excavation or fill activities are expected to occur at affected facilities. Further, the proposed project does not involve the removal of underground products (e.g., water, crude oil, et cetera) that could produce new, or make worse existing subsidence effects. Additionally, the affected areas are not envisioned to be prone to new risks from landslides or have unique geologic features, since the affected facilities are located in highly industrial/commercial areas where such features have already been altered or removed. Finally, since adoption of the proposed project would be expected to affect operations at primarily existing facilities, the proposed project is not expected to alter or make worse any existing potential for subsidence, liquefaction, etc.

Based on the above discussion, the proposed project is not expected to have an adverse impact on geology or soils. Since no significant adverse impacts are anticipated, this environmental topic will not be further analyzed in the final EA. No mitigation measures are necessary or required.

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b> 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
h) Significantly increased fire hazard in areas with flammable materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### **Significance Criteria**

Impacts associated with hazards will be considered significant if any of the following occur:

- 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**

**VIII. a, b) & c)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated as a result of PAR 1156. If the fenceline threshold is exceeded, the owner/operator of the affected property will have to submit a compliance which includes measures to reduce the on-site fugitive emissions. Therefore, the proposed project will not create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials.

Adoption of the proposed rule would establish procedures to reduce Cr<sup>+6</sup> emissions from facilities even after closure. Therefore, there is little likelihood that affected facilities will emit new hazardous emissions or handle hazardous materials, substances or waste within one-quarter mile of an existing or proposed school as a result of implementing the proposed project.

**VIII. d)** It is not anticipated that the proposed project will alter in any way how operators of facilities who are affected by PAR 1156 manage their hazardous wastes. Government Code §65962.5 typically refers to a list of facilities that may be subject to Resource Conservation and Recovery Act (RCRA) permits. For any facilities affected by the proposed project that are on the Government Code §65962.5 list, it is anticipated that they would continue to manage any and all hazardous materials and hazardous waste, in accordance with federal, state and local regulations.

Riverside Cement (1500 Rubidoux Ave.) was listed on the Department of Toxic Substances Control (DTSC) Envirostor database as an “evaluation” site. According to the listing, the site was screened by the EPA in 2007. No further information was available.

California Portland Cement Company was not identified on the Envirostor database. However, a “closed” rail site (Site ID- 400217) was identified as being located within the site boundary. The database identified this listing as “Inactive facility - clean closed” and indicated that the facility has completed its closure activities.

**VIII. e)** Neither of the affected facilities is within two miles of an airport or private air strip; therefore, implementation of the proposed project is not expected to create any additional safety hazards for people residing or working in the project area.

**VIII. f)** The proposed project does not contain any provisions which will impair implementation of, or physically interfere with any adopted emergency response plan or emergency evacuation plan. Since the proposed project does not involve the change in current uses of any hazardous materials, or generate any new hazardous waste, no changes to emergency response plans are anticipated.

**VIII. g)** The two affected facilities are located in developed urban areas, where wildlands are not prevalent, risk of loss or injury associated with wildland fires is not expected as a result of implementing the proposed project.

**VIII. h)** Affected facilities must comply with all local and county requirements for fire prevention and safety. The proposed project does not require any activities which would be in conflict with fire prevention and safety requirements, and thus would not create or increase fire hazards at these existing facilities.

Pursuant to local and county fire prevention and safety requirements, facilities are required to maintain appropriate site management practices to prevent fire hazards. The proposed project will not interfere with fire prevention practices.

In conclusion, potentially significant adverse hazard or hazardous material impacts resulting from adopting and implementing the proposed project are not expected and will not be considered further. No mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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## **IX. HYDROLOGY AND WATER**

**QUALITY.** 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?

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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**

PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated as a result of PAR 1156. If the fenceline threshold is exceeded, the owner/operator of the affected property will have to submit a compliance which includes measures to reduce the on-site fugitive emissions.

**IX. a) & f)** No additional amount of wastewater generation is expected from the implementation of the proposed project. Therefore, there would be no impact on the current wastewater infrastructure. The proposed project is not expected to cause potentially affected facilities to violate any water quality standard or wastewater discharge requirements. The adoption of the proposed project is not expected to have significant adverse water demand or water quality impacts for the following reasons:

- The proposed project does not increase total demand for water by more than 5,000,000 gallons per day (or 262,820 gallons per day of potable water).
- The proposed project does not require construction of new water conveyance infrastructure.
- The proposed project does not create a substantial increase in mass inflow of effluents to public wastewater treatment facilities.
- The proposed project does not result in a substantial degradation of surface water or groundwater quality.
- The proposed project does not result in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The proposed project does not result in alterations to the course or flow of floodwaters.

**IX. b)** Because the proposed requirements of PAR 1156 do not rely on water, no increase to any affected facilities' existing water demand is expected. No additional watering requirements are currently being proposed beyond those in the current rule. Therefore, implementation of PAR 1156 will not increase demand for, or otherwise affect groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. In addition, implementation of PAR 1156 will not increase demand for water from existing entitlements and resources, and will not require new or expanded entitlements. No provisions of the proposed rule are expected to interfere with groundwater recharge. Therefore, no water demand impacts are expected as the result of implementing PAR 1156.

**IX. c), d), & e)** Implementation of the proposed project will occur at existing facilities that are paved and have drainage infrastructure in place. Any modifications required by the proposed project are expected to take place within the existing footprints of the affected facilities, which are already completely developed with existing storm water collection systems. Therefore, no change to existing storm water runoff, drainage patterns, groundwater characteristics, or flow are expected.

**IX. g), h), & i)** The proposed project will not require construction of new housing, and all construction activities associated with PAR 1156 are expected to take place at existing facilities that are already developed. Therefore, the proposed project is not expected to generate construction of any new structures in 100-year flood areas as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood delineation map. Further, the proposed project is not expected to require additional operational workers at affected facilities. As a result, the proposed project is not expected to expose people or structures to significant new flooding risks, or make worse any existing flooding risks. Finally, the proposed project will not affect in any way any potential flood hazards inundation by seiche, tsunami, or mud flow that may already exist relative to existing facilities or create new hazards at existing facilities.

The proposed project is not expected to generate a substantial amount of new storm water runoff. Therefore, no new storm water discharge treatment facilities or modifications to existing facilities will be required due to the implementation of the proposed project. Accordingly, the proposed project is not expected to generate significant adverse impacts relative to construction of new storm water drainage facilities.

Based upon these considerations, significant hydrology and water quality impacts are not expected from the implementation of the proposed project and will not be further analyzed in this final EA. Since no significant hydrology and water quality impacts were identified, no mitigation measures are necessary or required.

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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**X. LAND USE AND PLANNING.**

Would the project:

- a) Physically divide an established community?
- 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?

### **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**

**X. a)** Adoption of the proposed rule would establish procedures to reduce Cr<sup>+6</sup> emissions from facilities even after closure. Since all construction activities are expected to take place at existing facilities that are already developed, implementation of the proposed project will not require or result in physically dividing an established community.

**X. b)** There are no provisions in the proposed project 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 would be altered by the proposed project. Affected facilities would have to comply with local ordinances and land use requirements. Therefore, as already noted in the discussion under “Biological Resources,” the proposed project would not affect any habitat conservation or natural community conservation plans, or agricultural resources or operations, and would not create divisions in any existing communities. Present or planned land uses in the region would not be significantly adversely affected as a result of implementing the proposed project.

Based upon these considerations, significant adverse land use and planning impacts are not expected from the implementation of the proposed project and will not be further analyzed in this final EA. Since no significant land use and planning impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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**XI. MINERAL RESOURCES.** 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**

**XI. a) & b)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. There are no provisions in the proposed project that would result in the loss of availability of a known mineral resource of value to the region and the residents of the state, 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 aforementioned considerations, significant mineral resources impacts are not expected from the implementation of the proposed project. Since no significant mineral resources impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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**XII. NOISE.** 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" type="checkbox"/>

### **Significance Criteria**

Noise impact 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**

**XII. a)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Any operational requirements imposed by the proposed project would not be expected to generate noise above the existing setting. All of the activities required by the proposed project are expected to occur at the two affected existing facilities. Thus, the proposed project is not expected to expose persons to the generation of excessive noise levels above current levels because no change in current operations is expected to occur as a result of the proposed project. It is expected that any facility affected by the proposed project would continue complying with all existing local noise control laws or ordinances.

**XII. b)** The proposed project is not anticipated to expose people to or generate excessive groundborne vibration or groundborne noise levels since no heavy construction is required for compliance with PAR 1156.

**XII. c)** A permanent increase in ambient noise levels at the affected locations above existing levels is not expected because the proposed project does not contain any operational requirements that would generate additional noise beyond existing levels. Therefore, the existing noise levels are unlikely to change and raise ambient noise levels in the vicinities of affected facilities to above a level of significance in response to implementing the proposed project.

**XII. d)** There are no airports located within two miles of the two affected facilities and there are no new noise impacts expected as a result of the proposed project to affect the operations of the airport. Therefore, the proposed project is not expected to expose people residing or working in the affected facilities vicinities to excessive noise levels. See also the response to item XII.a).

Based upon these considerations, significant adverse noise impacts are not expected from the implementation of the proposed project and are not further evaluated in this final EA. Since no significant noise impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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### **XIII. POPULATION AND HOUSING.**

Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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**

**XIII. a)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated as a result of PAR 1156. However, if any minor modifications are necessary to the two affected facilities, it is expected that workers can be drawn from the existing labor pool in southern California. Therefore, the proposed project is not anticipated to generate any significant effects, either direct or indirect, on the District's population or population distribution as no additional operational workers are

anticipated to be required at the affected facilities. Human population within the jurisdiction of the SCAQMD is anticipated to grow regardless of implementing the proposed project. As such, implementation of the proposed project will not result in changes in population densities or induce significant growth in population.

**XIII. b)** The affected facilities are already developed and compliance with PAR 1156 is not expected to result in the creation of any industry that would affect population growth, directly or indirectly induce the construction of single- or multiple-family units, or require the displacement of people elsewhere.

Based upon these considerations, significant adverse population and housing impacts are not expected from the implementation of the proposed project and are not further evaluated in this final EA. Since no significant population and housing impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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**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:

- a) Fire protection?
- b) Police protection?
- c) Schools?
- d) Parks?
- e) Other public facilities?

#### **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**

**XIV. a) & b)** Adoption of the proposed rule would minimize potential air quality impacts from cement facility closure and ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. There will be a compliance plan that is required if the ambient monitoring limit is exceeded. All new requirements would be expected to be compliant with fire department standards, therefore, they would not increase the risk of fire to occur. No other physical modifications or changes associated with the proposed project are expected and no flammable substances are necessary to comply with the proposed project. As such, the proposed project will not increase the chances for fires or explosions that could affect local fire departments. Finally, PAR 1156 is not expected to increase the need for security at affected facilities, which could adversely affect local police departments. Because the proposed project does not require or involve the use of new hazardous materials or generate new hazardous waste, it will not generate an emergency situation that would require additional fire or police protection, or impact acceptable service ratios or response times.

**XIV. c), d), & e)** As indicated in discussion under item XIII. Population and Housing, implementing the proposed project would not induce population growth or dispersion because no additional operational workers are expected to be needed at the existing affected facilities and construction workers will be temporary, not permanent. Therefore, with no increase in local population anticipated as a result of adopting and implementing the proposed project, additional demand for new or expanded schools or parks is also not anticipated. As a result, no significant adverse impacts are expected to local schools or parks.

Based upon these considerations, significant adverse public services impacts are not expected from the implementation of the proposed project and are not further evaluated in this final EA. Since no significant public services impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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### **XV. RECREATION.**

- 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?

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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**

**XV. a) & b)** As discussed under “Land Use and Planning” (Section X) above, there are no provisions in the proposed project that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments. No land use or planning requirements would be altered by the adoption of the proposed project, which only affects already developed cement producing facilities. Further, the proposed project would not affect District population growth or distribution (see “Population and Housing”- Section XIII) in ways that could increase the demand for or use of existing neighborhood and regional parks or other recreational facilities or require the construction of new or expansion of existing recreational facilities that might have an adverse physical effect on the environment because it would not directly or indirectly increase or redistribute population.

Based upon these considerations, significant recreation impacts are not expected from the implementation of the proposed project. Since no significant recreation impacts were identified, no mitigation measures are necessary or required.

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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### **XVI. SOLID/HAZARDOUS WASTE.**

Would the project:

- a) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?
  - b) Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?
- |  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" 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**

**XVI. a) & b)** Adoption of the proposed rule would minimize potential air quality impacts from cement facility closure and ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. There will be a compliance plan that is required if the ambient monitoring limit is exceeded. No additional waste will be diverted to landfills as a result of the proposed project. As a result, no substantial change in the amount or character of solid or hazardous waste streams is expected to occur.

Sanitation districts forecast future landfill capacity and encourage recycling. Any portions of spent control equipment (if needed) in the future that cannot be recycled are expected to be able to be disposed of in the available landfill capacity. Additionally, no waste is expected to be generated by the proposed project. The proposed project is not expected to increase the volume of solid or hazardous wastes from the two affected facilities, require additional waste disposal capacity, or generate waste that does not meet applicable local, state, or federal regulations.

Based upon these considerations, the proposed project is not expected to increase the volume of solid or hazardous wastes that cannot be handled by existing municipal or hazardous waste disposal facilities, or require additional waste disposal capacity. Further, implementing the proposed project is not expected to interfere with any affected facility's ability to comply with applicable local, state, or federal waste disposal regulations. Since no solid/hazardous waste impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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## XVII. TRANSPORTATION/TRAFFIC.

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?
- 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?
- 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?
- d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?
- e) Result in inadequate emergency access?
- 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?

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**

**XVII. a) & b)** Adoption of the proposed rule would minimize potential air quality impacts from cement facility closure and ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. The additional amount of trips required for monitoring sample collection (2 per week, per facility), if required, are not expected to increase congestion or diminish the level of service of any roadways in the vicinity of the two affected facilities.

Implementation of the proposed project would not result in a net change or cause any additional transportation demands or services. Similarly, the implementation of the proposed project is not expected to adversely affect circulation patterns on local roadways or the level of service at intersections near affected facilities.

Implementation of the proposed rule amendments would not require any construction activities. Since no construction-related trips and no additional operational-related trips per facility are anticipated, the adoption of the proposed project is not expected to significantly adversely affect circulation patterns on local roadways or the level of service at intersections near affected facilities.

**XVII. c)** Adoption of the proposed rule would minimize potential air quality impacts from cement facility closure and to ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project 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 the proposed project is not expected to adversely affect air traffic

patterns. Further, the proposed project will not affect in any way air traffic in the region because it will not require transport of any materials by air.

**XVII. d)** No physical modifications to roadways are expected to occur by implementing the proposed project. Therefore, no offsite modifications to roadways are anticipated for the proposed project that would result in an additional design hazard or new incompatible uses.

**XVII. e)** All potential physical changes caused by implementation of the proposed project are expected to occur within the existing boundaries of the affected facilities. As a result, the proposed project is not expected to adversely impact existing emergency access.

**XVII. f)** All potential physical changes caused by implementation of the proposed project are expected to occur within the existing boundaries of the affected facilities. No changes to the parking capacity at or in the vicinity of the affected facilities are expected. Therefore, no shortage of parking spaces is expected. Further, the proposed project is not expected to require additional operational workers, so additional parking capacity will not be required. Therefore, the proposed project is not expected to adversely impact on- or off-site parking capacity. The proposed project has no provisions that would conflict with alternative transportation, such as bus turnouts, bicycle racks, et cetera.

Based upon these considerations, the proposed project is not expected to generate significant adverse project-specific or cumulative transportation/traffic impacts and, therefore, this topic will not be considered further. Since no significant transportation/traffic impacts were identified, no mitigation measures are necessary or required.

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Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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### **XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.**

- 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?

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

**XVIII. a)** As discussed in the “Biological Resources” section, the proposed project is not expected to significantly adversely affect plant or animal species or the habitat on which they rely because any minor physical modifications that may occur as a result of the proposed project would occur at two existing cement production facilities that have already been greatly disturbed and that currently do not support such habitats. Additionally, special status plants, animals, or natural communities are not expected to be found within close proximity to the two facilities affected by the proposed project.

**XVIII. b)** Based on the foregoing analyses, cumulative impacts in conjunction with other projects that may occur concurrently with or subsequent to the proposed project are not expected to adversely impact any environmental topic. Related projects to the currently proposed project include existing and proposed amended rules and regulations, as well as AQMP control measures, which produce emission reductions from most industrial and commercial sectors. Furthermore, because the proposed project does not generate significant project-specific impacts, cumulative impacts are not considered to be "cumulatively considerable" as defined by CEQA guidelines §15065(a)(3). For example, the environmental topics checked ‘No Impact’ (e.g., aesthetics, agriculture resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, solid/hazardous waste and transportation and traffic) would not be expected to make any contribution to potential cumulative impacts whatsoever. Also, in the case of air quality impacts, the net effect of implementing the proposed project with other proposed amended rules and regulations, and AQMP control measures is an overall reduction in District-wide emissions, thus, contributing to the attainment of state and national ambient air quality standards. Therefore, it is concluded that the proposed project has no potential for significant cumulative or cumulatively considerable impacts in any environmental areas.

**XVIII. c)** Based on the foregoing analyses, the proposed project is not expected to cause significant adverse effects to human beings. Significant adverse air quality impacts are not expected from the implementation of the proposed project. Based on the preceding analyses, no significant adverse impacts to aesthetics, agriculture resources, air quality, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, solid/hazardous waste and transportation and traffic are expected as a result of the implementation of the proposed project.

As discussed in items I through XVIII above, the proposed project would have no potential to cause significant adverse environmental effects.

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## **APPENDIX A**

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### **PROPOSED AMENDED RULE 1156 – FURTHER REDUCTIONS OF PARTICULATE EMISSIONS FROM CEMENT MANUFACTURING FACILITIES**

In order to save space and avoid repetition, please refer to the latest version of Proposed Amended Rule 1156 located in the November 6, 2015 Governing Board Package.

## **APPENDIX B**

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### **CONSTRUCTION EMISSION CALCULATIONS**

## Construction Emissions

### Installation of Plastic Shrouding / Partitioning Material at Affected Facilities

#### Installation of Limited Dust Controls at 2

Affected Cement Manufacturing Facilities Construction Activity

#### Installing Plastic Shrouding / Partitioning Material around Bagging Operations and Doors

#### Construction Schedule - "Worst-case" Complete Installation at 2 Locations Simultaneously

Activity	Equipment Type	No. of Equipment	Hrs/day	Crew Size	
On-Road Mobile Source Operations	Delivery Truck	2	-	2	<i>– Deliver the control materials</i>
On-Road Mobile Source Operations	Worker Vehicle	10	-	20	<i>– Install Shrouding / Partitioning Materials</i>

Construction Vehicle (Mobile Source) Emission Factors for Years 2010	VOC lb/mile	CO lb/mile	NOx lb/mile	SOx lb/mile	PM10 lb/mile	PM2.5 lb/mile	CO2 lb/mile	CH4 lb/mile
Construction Related Activity								
Offsite (Construction Worker Vehicle)	0.00066355	0.00614108	0.00060188	0.00001070	0.00009259	0.00006015	1.10192837	0.00005923
Offsite (Equipment Delivery Truck - HHDT)	0.00178608	0.00766891	0.02122678	0.00004082	0.00104715	0.00087977	4.20902225	0.00008369

Source: EMFAC 2007 (v2.3) Emission Factors (On-Road Vehicles, Scenario Year 2015)

Composite Emission Factors for Passenger Vehicle and Heavy-Heavy Duty Trucks for Scenario Year 2015

[http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-\(v2-3\)-emission-factors-\(on-road\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-(v2-3)-emission-factors-(on-road))

#### Construction Worker Number of Trips and Trip Length

Vehicle	No. of One-Way Trips/Day	Trip Length (miles)
Offsite (Construction Worker)	20	25
Offsite (Delivery/Haul Truck - HHDT)	4	50

#### Incremental Increase in Offsite Combustion Emissions from Construction Vehicles

Equation: Emission Factor (lb/mile) x No. of One-Way Trips/Day x Number of workers x Trip length (mile) = Offsite Construction Emissions (lbs/day)

Vehicle	VOC lb/day	CO lb/day	NOx lb/day	SOx lb/day	PM10 lb/day	PM2.5 lb/day	CO2 lb/day	CH4 lb/day
Offsite (Construction Worker Vehicle)	0.33	3.07	0.30	0.01	0.05	0.03	550.96	0.03

November 2015

### Construction Emissions

Offsite (Delivery/Haul HHDT)	0.36	1.53	4.25	0.01	0.21	0.18	841.80	0.02
<b>Vehicle TOTAL</b>	<b>0.69</b>	<b>4.60</b>	<b>4.55</b>	<b>0.01</b>	<b>0.26</b>	<b>0.21</b>	<b>1392.77</b>	<b>0.05</b>

#### Total Incremental Combustion Emissions from Construction Activities (Construction Equipment, Trucks and Workers' Vehicles)

	VOC lb/day	CO lb/day	NOx lb/day	SOx lb/day	PM10 lb/day	PM2.5 lb/day	CO2 lb/day	CH4 lb/day	CO2eq MT/year
<b>TOTAL</b>	<b>0.69</b>	<b>4.60</b>	<b>4.55</b>	<b>0.01</b>	<b>0.26</b>	<b>0.21</b>	<b>1392.77</b>	<b>0.05</b>	<b>1.27</b>
Significant Threshold	75	550	100	150	150	55	n/a	n/a	10,000
Exceed Significance?	NO	NO	NO	NO	NO	NO	n/a	n/a	NO

## Construction Emissions

### Total Increase in Fuel Usage From Construction Equipment and Workers' Vehicles

Overall Construction Activity	Total Project Hours of Operation	Equipment Type	Off-Road	Total Diesel	Total Gasoline
			Fuel (gal/hr)	Fuel Use (gallons)	Fuel Use (gals)
Workers' Vehicles* - Commuting	N/A	Mixed Passenger	N/A	N/A	50.00
Offsite Delivery Trucks**	N/A	Heavy-Heavy Duty Delivery Truck	N/A	26.67	N/A
<b>TOTAL</b>			<b>26.67</b>	<b>50.00</b>	

\*Assume that construction workers' commute vehicles use gasoline and get 20 mi/gal and round trip length is 50 miles/phase.

\*\*Assume that delivery trucks use diesel and get 15 miles/gallon traveling 100 miles roundtrip; 2 locations

## **APPENDIX C**

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### **OPERATIONAL EMISSION CALCULATIONS**

## Operational Emissions

### Application of Soil Stabilizers and Additional Sampling Trips at Affected Facilities

#### Application of Soil Stabilizers and Additional Sampling at Affected Cement Manufacturing Facilities

#### Construction Activity Application of Additional Soil Stabilizers

**Operation Schedule - "Worst-case" Complete Soil Stabilizer Application at 2 facilities simultaneously**

Activity	Equipment Type	No. of Equipment			Crew Size
		Hrs/day			
Off-Road Mobile Source Operations	Application / Spraying Truck- Other Construction Equip. Composite	2	8		2
On-Road Mobile Source Operations	Worker Vehicle	2	-		2
On-Road Mobile Source Operations	Worker Vehicle	2	-		2

– Spray soil stabilizer into place

– Spraying vehicle operator

– Sample Pick-up and Delivery to Lab

2015 Construction Equipment Emission Factors	VOC	CO	NOx	SOx	PM10	PM2.5	CO2	CH4
	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Spraying Truck- Other Construction Equip. (composite)	0.0768	0.3645	0.6392	0.0013	0.0264	0.0264	123	0.0069

\*Equipment is assumed to be diesel fueled.

Source: CARB's Off-Road Mobile Source Emission Factors for Scenario Year 2015      <http://www.aqmd.gov/home/regulations/cega/air-quality-analysis-handbook/off-road-mobile-source-emission-factors>

Construction Vehicle (Mobile Source) Emission Factors for Years 2015	VOC	CO	NOx	SOx	PM10	PM2.5	CO2	CH4
	lb/mile							
Offsite (Construction Worker Vehicle- Spray Vehicle Operator)	0.00066355	0.00614108	0.00060188	0.00001070	0.00009259	0.00006015	1.10192837	0.00005923
Offsite (Worker Vehicle for Collecting Samples and Delivering to Lab)	0.00066355	0.00614108	0.00060188	0.00001070	0.00009259	0.00006015	1.10192837	0.00005923

Source: EMFAC 2007 (v2.3) Emission Factors (On-Road Vehicles, Scenario Year 2015)

[http://www.aqmd.gov/home/regulations/cega/air-quality-analysis-handbook/emfac-2007-\(v2-3\)-emission-factors-\(on-road\)](http://www.aqmd.gov/home/regulations/cega/air-quality-analysis-handbook/emfac-2007-(v2-3)-emission-factors-(on-road))

## Operational Emissions

### Construction Worker Number of Trips and Trip Length

Vehicle	No. of One-Way Trips/Day	Trip Length (miles)
Offsite (Construction Worker- Spray Vehicle Operator)	4	25
Offsite (Worker Vehicle for Collecting Samples and Delivering to Lab)	4	25

### Incremental Increase in Onsite Combustion Emissions from Construction Equipment

Equation: Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Onsite Construction Emissions (lbs/day)

Equipment Type	VOC lb/day	CO lb/day	NOx lb/day	SOx lb/day	PM10 lb/day	PM2.5 lb/day	CO2 lb/day	CH4 lb/day
Spraying Truck- Other Construction Equip. (composite)	1.23	5.83	10.23	0.02	0.42	0.42	1961.57	0.11
<b>Construction Equip TOTAL</b>	<b>1.23</b>	<b>5.83</b>	<b>10.23</b>	<b>0.02</b>	<b>0.42</b>	<b>0.42</b>	<b>1961.57</b>	<b>0.11</b>

### Incremental Increase in Offsite Combustion Emissions from Construction Vehicles

Equation: Emission Factor (lb/mile) x No. of One-Way Trips/Day x Number of workers x Trip length (mile) = Offsite Construction Emissions (lbs/day)

Vehicle	VOC lb/day	CO lb/day	NOx lb/day	SOx lb/day	PM10 lb/day	PM2.5 lb/day	CO2 lb/day	CH4 lb/day
Offsite (Construction Worker- Spray Vehicle Operator)	0.07	0.61	0.06	0.00	0.01	0.01	110.19	0.01
Offsite (Worker Vehicle for Collecting Samples and Delivering to Lab)	0.07	0.61	0.06	0.00	0.01	0.01	110.19	0.01
<b>Vehicle TOTAL</b>	<b>0.13</b>	<b>1.23</b>	<b>0.12</b>	<b>0.00</b>	<b>0.02</b>	<b>0.01</b>	<b>220.39</b>	<b>0.01</b>

### Total Incremental Combustion Emissions from Operational Activities (Soil Stabilization Equipment and Workers' Vehicles)

	VOC lb/day	CO lb/day	NOx lb/day	SOx lb/day	PM10 lb/day	PM2.5 lb/day	CO2 lb/day	CH4 lb/day	CO2eq MT/year
<b>TOTAL</b>	<b>1.36</b>	<b>7.06</b>	<b>10.35</b>	<b>0.02</b>	<b>0.44</b>	<b>0.43</b>	<b>2181.95</b>	<b>0.12</b>	<b>1.99</b>
Significant Threshold	75	550	100	150	150	55	n/a	n/a	10,000
Exceed Significance?	NO	NO	NO	NO	NO	NO	n/a	n/a	NO

## Operational Emissions

### Total Increase in Fuel Usage From Soil Stabilization Equipment and Workers' Vehicles

Overall Operational Activity	Total Project Hours of Operation	Equipment Type	Off-Road Fuel (gal/hr)*	Total Diesel Fuel Use (gallons)	Total Gasoline Fuel Use (gals)
Application of Additional Soil Stabilizer	16	Spraying Truck- Other Construction Equip. (composite)	2.47	79.04	N/A
Workers' Vehicles** - Spray Vehicle Operator	N/A	Mixed Passenger	N/A	N/A	10.00
Offsite (Worker Vehicle for Collecting Samples and Delivering to Lab)**	N/A	Heavy-Heavy Duty Delivery Truck	N/A	N/A	10.00
<b>TOTAL</b>			<b>79.04</b>	<b>20.00</b>	

\*Based on CARB's Off-Road Model (Version 2.0).

\*\*Assume that construction workers' commute vehicles use gasoline and get 20 mi/gal and round trip length is 50 miles/phase.

\*\*\*Assume that sample collection/delivery vehicles use gasoline and get 20 miles/gallon traveling 50 miles roundtrip; 2 locations