

Draft

**Initial Study/Negative Declaration for the
Amendments to Bay Area Air Quality
Management District Regulation 8,
Rules 4, 14, 19, 31, and 43
(Surface Coating Rules)**

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Contents

Chapter 1	Introduction	1-1
	Purpose of This Document	1-1
	Scope of This Document.....	1-1
	Impact Terminology.....	1-2
	Organization of This Document	1-2
Chapter 2	Description of Proposed Amendments.....	2-1
	Background	2-1
	Proposed Amendments	2-2
	Affected Area.....	2-3
Chapter 3	Environmental Checklist.....	3-1
	Aesthetics.....	3-3
	Setting	3-3
	Discussion of Impacts	3-3
	Agricultural Resources.....	3-4
	Setting	3-4
	Discussion of Impacts	3-4
	Air Quality.....	3-5
	Setting	3-5
	Discussion of Impacts	3-7
	Biological Resources.....	3-9
	Setting	3-9
	Discussion of Impacts	3-10
	Cultural Resources.....	3-11
	Setting	3-11
	Discussion of Impacts	3-12
	Geology and Soils.....	3-13
	Setting	3-13
	Discussion of Impacts	3-14
	Hazards and Hazardous Materials.	3-15
	Setting	3-16
	Discussion of Impacts	3-19
	Hydrology and Water Quality.....	3-21
	Setting	3-22
	Discussion of Impacts	3-22
	Land Use and Planning.....	3-24
	Setting	3-24
	Discussion of Impacts	3-25

Mineral Resources.....	3-26
Setting	3-26
Discussion of Impacts	3-26
Noise.....	3-28
Setting	3-28
Discussion of Impacts	3-29
Population and Housing.....	3-30
Setting	3-30
Discussion of Impacts	3-31
Public Services.....	3-32
Setting	3-32
Discussion of Impacts	3-33
Recreation.....	3-34
Setting	3-34
Discussion of Impacts	3-34
Transportation/Traffic.....	3-35
Setting	3-35
Discussion of Impacts	3-36
Utilities and Service Systems.....	3-37
Setting	3-37
Discussion of Impacts	3-38
Mandatory Findings of Significance.....	3-39
Discussion of Impacts	3-39
Chapter 4	
References Cited	4-1

Purpose of This Document

As required by the California Environmental Quality Act (CEQA) and in compliance with the State CEQA Guidelines (14 California Administrative Code 1400 et seq.), this initial study/negative declaration (IS/ND) is a public document that assesses the environmental effects (impacts) of the proposed amendments to Bay Area Air Quality Management District (BAAQMD) Regulation 8, “Organic Compounds”:

- Rule 4, “General Solvent and Surface Coating Operations,”
- Rule 14, “Surface Coating of Large Appliance and Metal Furniture,”
- Rule 19, “Surface Coating of Miscellaneous Metal Parts and Products,”
- Rule 31, “Surface Coating of Plastic Parts and Products,” and
- Rule 43, “Surface Coating of Marine Vessels.”

These rules are collectively known as “surface coating rules.”

An IS/ND serves as an informational document to be used in the local planning and decision-making process; it does not recommend approval or denial of the project analyzed therein. BAAQMD, the state lead agency under CEQA, must consider the impacts of the proposed amendments when determining whether to approve the amendments. BAAQMD has prepared this IS/ND because all significant impacts resulting from the proposed amendments would be reduced to less-than-significant levels through the implementation of mitigation measures

Scope of This Document

This document evaluates the proposed amendments’ impacts on the following resource areas:

- aesthetics,
- agricultural resources,

- air quality,
- biological resources,
- cultural resources,
- geology and soils,
- hazards and hazardous materials,
- hydrology and water quality,
- land use planning,
- mineral resources,
- noise,
- population and housing,
- public services,
- recreation,
- transportation/traffic, and
- utilities and service systems.

The impacts on these resource areas are evaluated using the initial study checklist in chapter 3; each resource area is divided into several topics designated by letter. The level of significance of an impact on a resource topic is indicated through the use of the terms discussed below.

Impact Terminology

The following terminology is used in this IS/ND to describe the levels of significance of impacts that would result from the proposed amendments.

- A conclusion of *no impact* is appropriate when the analysis concludes that there would be no impact on a particular resource topic.
- An impact is considered *less than significant* if the analysis concludes that an impact on a particular resource topic would not be significant (i.e., would not exceed certain criteria or guidelines established by BAAQMD).
- An impact is considered *less than significant with mitigation incorporated* if the analysis concludes that that an impact on to a particular resource topic would be significant (i.e., would exceed certain criteria or guidelines established by BAAQMD) but would be reduced to a less-than-significant level through the implementation of mitigation.

Organization of This Document

The content and format of this document, described below, are designed to meet the requirements of CEQA.

- Chapter 1, “Introduction,” identifies the purpose, scope, and terminology of the document.
- Chapter 2, “Description of the Proposed Amendments,” provides background information on Rules 4, 14, 19, 31, and 43; describes the proposed amendments; and describes the area and facilities that would be affected by the surface coating rules and the amendments.
- Chapter 3, “Environmental Checklist,” presents the checklist responses for each resource topic. This chapter includes a brief setting description for each resource area and identifies the proposed amendment’s impacts on the resources topics listed in the checklist.
- Chapter 4, “References Cited,” identifies all printed references and personal communications cited in this report.

Description of Proposed Amendments

Background

The original intent of Rule 4, adopted in 1974, was to control sources of solvent evaporation and surface coating by limiting the amount of more reactive organic compounds that could be emitted. However, with the subsequent adoption of other rules for specific applications, Rule 4 has applied to fewer and fewer sources. The purpose of Rule 4 is to limit emissions of volatile organic compounds (VOCs) from the use of solvents and surface coatings in any operation other than those specified by other rules of Regulation 8. The provisions of Rule 4 apply to, but are not limited to, model making, printed circuit board manufacturing and assembly, surface coating of test panels, training facilities where the application of coating is for training purposes, stencil coatings, low-usage coating activities exempt from other Regulation 8 rules, coatings specifically exempt from other Regulation 8 rules, or solvent usage not specified by other Regulation 8 rules.

Rule 14, applicable to the surface coating of large appliances and metal furniture, was derived from two U.S. Environmental Protection Agency (EPA) Control Technology Guidelines (CTGs): one for coating of metal furniture, and one for coating of large appliances. Rule 14 was adopted by BAAQMD on March 7, 1979. It has been amended numerous times to impose more stringent VOC limits and to align the rule with EPA policies.

Rule 19 was adopted on January 9, 1980, for the surface coating of metal parts and products not subject to Rule 14 and was also based on an EPA CTG. This rule, also amended numerous times, is significant in the Bay Area because it affected a large quantity of organic compound emissions associated with the manufacture of computer housing and military specification equipment.

Rule 31, for coating of plastic parts, was significant as a result of the shift from metal to plastic housing for computer components. It was adopted on September 7, 1983.

Rule 43, for surface coating of ships, barges, submarines, offshore oil platforms, and other items subject to a marine environment, was adopted on November 23, 1988.

The surface coating rules collectively affect a diverse group of product and component manufacturers and job shops that make housings and parts to specifications or merely surface coat to specifications products that were manufactured elsewhere.

The proposed amendments implement control measure SS-13 of the *2001 San Francisco Bay Area Ozone Attainment Plan for the 1-Hour National Ozone Standard* (2001 OAP) (Bay Area Air Quality Management District 2001a). The 2001 OAP calls for the reduction of VOCs to enable the Bay Area to attain the 1-hour national ambient air quality standard (NAAQS) for ozone. It contains various control measures for stationary and area sources based on emission reduction opportunities identified during development of the plan. Some organic compounds, such as acetone, are exempt because they have a negligible contribution to photochemical reactivity, and therefore do not contribute to ozone depletion. Only compounds that do not contribute to stratospheric ozone depletion and are not toxic are exempt from being considered VOCs.

Proposed Amendments

The proposed amendments would require replacement of organic solvents used in surface preparation and cleanup with low VOC formulations. The proposed amendments to the surface coating rules will require use of a surface preparation solvent that contains no more than 50 grams per liter (0.42 pound per gallon) of VOCs. Certain organic solvents are exempt from the definition of VOC in these rules: acetone, methyl acetate, parachlorobenzotrifluoride, and the family of volatile methyl siloxanes. BAAQMD staff have identified numerous options that are currently available to meet the proposed VOC standards. Various exemptions are provided specific to each rule, as discussed below.

Exemptions have been provided in each rule that are specific to the sources covered by the rule, but are similar from rule to rule. The proposed amendments to Rule 4 exempt the surface preparation of electrical and electronic components, precision optics, and numismatic dies; the stripping of cured inks, coatings, and adhesives, or cleaning of resin, coating, ink, and adhesive mixing, molding, and application equipment; and research and development operations, medical device and pharmaceutical manufacturing operations, and coating performance or quality control testing. Also, surface preparation for specific coating rules is exempted, as proposed amendments to each of these rules add surface preparation standards specific to sources covered by the rule. Finally, the Rule 4 amendments include a limited exemption of wipe cleaning of production machinery that will delay the implementation of the low-VOC standard for 1 year.

In Rule 14, specific exemptions are proposed for electrical and electronic components; the stripping of cured inks, coatings, and adhesives, or cleaning of resin, coating, ink, and adhesive mixing, molding, and application equipment; and research and development, performance testing, and quality control operations.

The Rule 19 amendments include the same exemptions as proposed for Rule 14, as well as an exemption for medical devices and a limited exemption for military components. The military component exemption is included because specifications for contract military equipment, including those for solvent cleaning processes, take time to develop and incorporate into new contracts. The exemption gives contractors time to apply for changes in contract specifications based on local environmental regulations and allows existing contracts to be fulfilled in compliance with current specifications.

The exemptions in Rule 19 are replicated in Rule 31 for plastic parts and products, with the addition of an exemption for precision optics.

In Rule 43, amendments include the same exemptions as proposed for Rule 19, as well as exemptions for long-term contracts associated with missile launch tubes and components of marine propulsion units for U.S. Navy submarines.

The proposed amendments will affect coaters and anyone using solvents for surface preparation and cleanup of products affected by these rules, whether the products are eventually surface coated or not. Consequently, machine shops, plating shops, and other metal treatment facilities may also be affected. Before developing the draft rule, BAAQMD staff performed a preliminary analysis of the revisions to Rule 4 and prepared a staff report describing the findings (Bay Area Air Quality Management District 2002). BAAQMD staff also conducted stakeholders meetings with affected businesses and other interested parties to discuss issues, exchange information, and improve communication among the various parties. A public workshop was held by BAAQMD staff on Thursday, June 20, 2002, in San Jose, California, to review and discuss proposed amendments to the five Regulation 8 rules concerning surface coating operations, including Rule 4. The amendments are based on rules already implemented in the South Coast Air Quality Management District (SCAQMD) and recently adopted in the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) and the Sacramento Metropolitan Air Quality Management District (SMAQMD).

Affected Area

Most operations covered by these surface coating rules take place within existing commercial and industrial buildings and facilities within the BAAQMD. The BAAQMD encompasses all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties and portions of western Solano and southern Sonoma Counties, covering approximately 5,600 square miles. The Bay Area is characterized by a large, shallow basin surrounded by coastal mountain ranges tapering into sheltered inland valleys. The combined climatic and topographic factors present in the Bay Area result in an increased potential for accumulation of air pollutants in the inland valleys and a reduced potential for buildup of air pollutants along the coast.

The BAAQMD is a nonattainment area for the 1-hour NAAQS for ozone. Ozone, a criteria pollutant, is formed from a reaction of VOCs and oxides of nitrogen (NO_x) in the presence of ultraviolet light (sunlight). EPA has set primary NAAQS for ozone and other air pollutants to define the levels considered safe for human health.

The BAAQMD is also a nonattainment area for the 1-hour state ambient air quality standard (SAAQS) for ozone. The California Air Resources Board (CARB) set the 1-hour SAAQS for ozone at 9 parts per hundred million (pphm), which is significantly more stringent than the corresponding NAAQS of 12 pphm. Under both the federal and California Clean Air Acts (CAA and CCAA), areas that are not in compliance with ozone standards must prepare plans to reduce ozone.

Chapter 3

Environmental Checklist

ENVIRONMENTAL CHECKLIST FORM

- 1. Project Title:** Amendments to Bay Area Air Quality Management District Regulation 8, “Organic Compounds”: Rule 4, “General Solvent and Surface Coating Operations”; Rule 14, “Surface Coating of Large Appliance and Metal Furniture”; Rule 19, “Surface Coating of Miscellaneous Metal Parts and Products”; Rule 31, “Surface Coating of Plastic Parts and Products”; and Rule 43, “Marine Vessel Coating” (Surface Coating Rules)
- 2. Lead Agency Name and Address:** Bay Area Air Quality Management District
939 Ellis Street
San Francisco, California 94109
- 3. Contact Person and Phone Number:** Daniel Belik, Air Quality Specialist
415/749-4786 or dbelik@baaqmd.gov
- 4. Project Location:** This rule applies to the area within the jurisdiction of the BAAQMD, which encompasses all of Alameda, Contra Costa, Marin, San Francisco, San Mateo, Santa Clara, and Napa Counties and portions of southwestern Solano and southern Sonoma Counties.
- 5. Project Sponsor’s Name and Address:** (same as above)
- 6. General Plan Designation:** N/A
- 7. Zoning:** N/A
- 8. Description of Project:** See “Background” and “Proposed Amendments” in Chapter 2
- 9. Surrounding Land Uses and Setting:** See “Affected Area” in Chapter 2
- 10. Other Public Agencies Whose Approval Is Required:** None

Environmental Factors Potentially Affected:

The environmental factors checked below would potentially be affected by this project (i.e., the project would involve at least one impact that is a “Potentially Significant Impact”), as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | |

Determination:

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have an impact on the environment that is “potentially significant” or “potentially significant unless mitigated” 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 IMPACT REPORT 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 IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

Signature

Date

Printed Name

For

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
I. AESTHETICS.				
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 along a 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 that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The BAAQMD covers all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties, and portions of western Solano and southern Sonoma Counties. In terms of physiography, the Bay Area is characterized by a large, shallow basin surrounded by coastal mountain ranges. Because the area of coverage is so vast (approximately 5,600 square miles), land uses vary greatly and include commercial, industrial, residential, and agricultural uses.

Discussion of Impacts

- a-c. Most of these affected operations take place within existing facilities located in industrial and commercial areas, and the proposed amendments neither require nor are likely to result in construction. Because solvents and surface coatings typically are applied within existing buildings and emissions are controlled by the use of existing low-VOC coating technology or control systems, no building alterations that could affect scenic resources or degrade the visual character or quality of a site are anticipated. Therefore, there is no impact.
- d. No additional sources of light would be required for the facilities under the proposed amendments. Affected facilities are generally located in industrial and commercial areas, and existing light sources are expected to be sufficient. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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II. AGRICULTURAL RESOURCES.

In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation. 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 conflict with a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

As described under “Aesthetics,” land uses in the affected area vary greatly and include agricultural lands. Some of these agricultural lands are under Williamson Act contracts.

Discussion of Impacts

- a–c. No effect on agricultural resources is expected because the proposed amendments apply to existing operations involving use of solvents and surface coatings, most of which take place within existing facilities located in industrial and commercial areas. The proposed amendments neither require nor are likely to result in construction inside or outside those facilities. No changes in manufacturing locations or facilities are expected, and therefore there is no potential for conversion of farmland or conflicts related to agricultural uses or land under a Williamson Act contract. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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III. AIR QUALITY.

When available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a.	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for 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"/>

Setting

Existing Conditions

The pollutants of greatest concern in the BAAQMD are various components of photochemical smog (ozone and other pollutants) and particulate matter less than or equal to 10 microns in diameter (PM10). Ozone, a criteria pollutant, is formed from a reaction of VOCs and NO_x in the presence of ultraviolet light (sunlight). Ozone problems arise primarily from vehicle traffic associated with urban development. However, stationary source activities also contribute to the emission inventory. Sensitive land uses typically include residences, hospitals, schools, and motels/hotels. These land uses are considered sensitive to air pollutants because people are often situated in these areas for extended periods of time.

The primary purpose of the surface coating rules is to limit the emissions of VOCs from paints and coatings as they dry and cure. There are approximately 308 facilities that surface coat products subject to Rules 14, 19, 31, and 43, collectively, and an additional 332 that wipe clean subject to Rule 4. There are

undoubtedly other unpermitted facilities subject to Rule 4. The amendments will affect not only those facilities, but also those that use solvent for surface preparation or cleaning and do not apply surface coatings. Such facilities include those that manufacture and surface coat, or only surface coat, metal appliances and metal furniture, miscellaneous metal, and plastic parts, including military contractors and computer parts manufacturers, marine vessel and component manufacturers, and manufacturers of metal or plastic parts that do not typically get surface coated.

The federal and state governments have established standards (NAAQS and SAAQS, respectively) for these and other criteria pollutants. The BAAQMD is designated as a nonattainment area for the 1-hour NAAQS and SAAQS for ozone.

Regulatory Setting

At the federal level, the federal CAA Amendments of 1990 give EPA additional authority to require states to reduce emissions of ozone precursors and PM10 in nonattainment areas. The amendments set new attainment deadlines based on the severity of problems. At the state level, CARB has traditionally established SAAQS, maintained oversight authority in air quality planning, developed programs for reducing emissions from motor vehicles, developed air emission inventories, collected air quality and meteorological data, and approved state implementation plans. At a more local level, California's air districts (e.g., BAAQMD) are responsible for overseeing stationary source emissions, approving permits, maintaining emissions inventories, maintaining air quality stations, overseeing agricultural burning permits, and reviewing air quality-related sections of environmental documents required by CEQA.

Bay Area Air Quality Management District

BAAQMD regulates air contaminants from stationary sources. BAAQMD is governed by a 21-member Board of Directors composed of publicly elected officials apportioned according to the population of the represented counties. The board has the authority to develop and enforce regulations for the control of air pollution within its jurisdiction. BAAQMD is responsible for implementing emissions standards and other requirements of federal and state laws. (Bay Area Air Quality Management District 2001b.)

BAAQMD's most recent plan for the California ozone standard, the 2000 Clean Air Plan, was prepared by the BAAQMD, in cooperation with the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG), and was adopted by the BAAQMD Board of Directors on December 20, 2000. The plan's main objective is to attain the SAAQS for ozone. It presents a comprehensive strategy to reduce emissions from stationary, area, and mobile sources, and includes a specific measure that encourages cities and counties to develop and implement local plans, policies, and programs to reduce auto use and

improve air quality. The CCAA requires regions to update their (state) air quality plans every 3 years.

The proposed rule amendments implement a measure from BAAQMD's most recent plan for the federal ozone standard, the 2001 OAP. The 2001 OAP was developed in response to EPA's partial disapproval of the 1999 OAP and finding of failure to attain the NAAQS for ozone of the 2001 OAP. In response to EPA's findings, BAAQMD, MTC, and ABAG prepared the Revised 2001 OAP, which includes a strategy to meet applicable federal CAA planning requirements, to address deficiencies in the 1999 OAP, and to attain the 1-hour NAAQS for ozone in the Bay Area. Part of the strategy is to adopt control measures, such as SS-13. SS-13 would specify that only low-VOC-content cleaning solutions can be used for wipe cleaning for the surface preparation of large appliances and miscellaneous metal parts and products. The projected rule amendments expand SS-13 into several other related areas, specifically marine vessel coating, plastic parts coating, and unspecified wipe cleaning operations governed by Rule 4. The proposed amendments would fulfill the objectives of SS-13 and produce emission reductions estimated at 2.1 tons per day, greater than the 0.3 ton per day projected by SS-13 from only two rules. No increase in Air Toxics emissions has been identified.

The proposed amendments are also based in part on SCAQMD Rule 1171 and SJVUAPCD Rule 4663. A similar new rule for the SMAQMD was approved on May 23, 2002.

Discussion of Impacts

- a-c. The objective of the proposed amendments is to reduce VOC emissions from affected operations at existing commercial and industrial facilities. As detailed in the BAAQMD staff report, the total emission reduction is conservatively calculated to be a minimum of 60%. For 2003, the 2001 OAP estimates a reduction of 0.3 ton of VOC per day from a 0.5-ton-per-day inventory for the categories of miscellaneous metal parts and products and large appliances and metal furniture, which represents a 60% reduction. Recent inventory updates show a 0.44-ton-per-day inventory for these two categories, a 0.24-ton-per-day inventory for plastic parts and products, and 0.07-ton-per-day inventory for marine vessel coating, totaling 0.75 ton per day. (BAAQMD staff estimate an additional 3-ton-per-day inventory from the unspecified handwiping category.) The emission reduction estimate for these amendments is approximately 2.1 tons per day, which represents a 93% reduction from use of pure solvent, with 60–75% of solvents affected, depending on the rule. These emission reductions are an air quality benefit. Therefore, there is no impact.
- d-e. The definition of the term “volatile organic compound” found in each rule would be amended to add methyl acetate to each definition's list of compounds that are not treated as VOCs. At the same time, the definition in Rules 14, 19, 31, and 43 would delete methylene chloride, 1,1,1-trichloroethane (1,1,1-TCA), and various chlorofluorocarbons (CFCs)

from the same list (these compounds were deleted from the list in Rule 4 by previous amendments). The effect of these amendments would be that methyl acetate would no longer count as a VOC in determining compliance with rule VOC limits but methylene chloride, 1,1,1-TCA, and various CFCs would count. The result could be minor increases in the use of methyl acetate and corresponding decreases in the use of methylene chloride and the other compounds currently exempted.

On April 1, 1998, EPA exempted methyl acetate from control based on a determination that methyl acetate has a negligible effect on atmospheric photochemical reactions. Methyl acetate is a low-boiling-point ester solvent that evaporates rapidly. It may be useful as a substitute coating solvent because it is soluble in water, alcohol, acetone, and a variety of other solvents. It is not an ozone-depleting chemical and has not been found to be toxic by EPA or California. It is flammable and has a fruity odor characteristic of esters. BAAQMD staff have examined EPA's deregulation of methyl acetate and found that it should not result in any potential adverse air quality impacts, even if usage increases as a substitute for non-exempt VOCs that are ozone-forming. Typically, the odor of esters is not found to be unpleasant to most people compared to a variety of other solvents. Coatings often have esters already in the solvent mixture; therefore, it is not expected that new use or substitution of methyl acetate will result in the creation of objectionable odors. In addition, most coating operations take place indoors in existing facilities located in industrial and commercial areas, and resulting odors would not occur in areas frequented by substantial numbers of people.

Because methyl acetate is neither a toxic air contaminant nor a stratospheric ozone depleter, because methylene chloride is a toxic air contaminant, and because most of the other compounds being deleted from the existing VOC definitions are stratospheric ozone depleters, the net effect of the VOC definition amendments is to decrease environmental impacts. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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 Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. | Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. | Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. | Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Setting

The BAAQMD covers all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties, and portions of western Solano and southern Sonoma Counties. The land uses and affected environment vary substantially throughout the area. Rule 4 applies to the use of solvent for wipe cleaning operations (and other surface coating and solvent emitting operations) that are not

specifically subject to any other Regulation 8 rule. The proposed VOC standards for surface preparation solvent in Rules 14, 19, 31, and 43 will reduce emissions from substrates and products specifically subject to these rules, and the same proposed standards in Rule 4 will reduce wipe cleaning emissions from substrates and products exempted from or not covered by other rules. There are approximately 640 permitted facilities affected by these rules within the BAAQMD. In addition to manufacturing and facilities that are engaged in coating or cleaning metal and plastic parts and products separate from the manufacturer, the proposed amendments may affect machine shops, metal platers, and other treatment facilities. The majority of affected stationary sources occur in areas zoned for industrial or commercial land use. Typically, these facilities are surrounded by other commercial and industrial facilities. Because this is a rule revision and affected sources have been previously identified, BAAQMD has an inspection and tracking program that monitors compliance at the affected facilities.

Discussion of Impacts

- a-f. No effects on biological resources are anticipated because the proposed rule amendments apply to existing operations at industrial or commercial facilities involving use of solvents and surface coatings, most of which take place within existing facilities. In addition, no construction outside existing facilities is expected. The proposed amendments neither require nor are likely to result in activities that would affect wildlife species or sensitive biological communities, or conflict with plans and policies relating to protection of biological resources. Therefore, there is no impact.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
V. CULTURAL RESOURCES.					
	Would the project:				
a.	Cause a substantial adverse change in the significance of a historical resource as defined in Section 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 pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic 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"/>

Setting

Cultural resources are defined as buildings, sites, structures, or objects that might have historical, architectural, archaeological, cultural, or scientific importance. The State CEQA Guidelines define a significant cultural resource as a “resource listed or eligible for listing on the California Register of Historical Resources [CRHR]” (Public Resources Code Section 5024.1). A project would have a significant impact if it would cause a substantial adverse change in the significance of a historical resource (State CEQA Guidelines Section 15064.5[b]). A substantial adverse change in the significance of a historical resource would result from an action that would demolish or adversely alter the physical characteristics of the historical resource that convey its historical significance and that qualify the resource for inclusion in the CRHR or in a local register or survey that meets the requirements of Public Resources Code Sections 5020.1(k) and 5024.1(g).

The majority of affected stationary sources occur in areas zoned for industrial or commercial land use. Typically, these facilities are surrounded by other commercial and industrial facilities. Because this is a rule revision and affected sources have been previously identified, BAAQMD has an inspection and tracking program that monitors compliance at the affected facilities.

Discussion of Impacts

- a-d. No effect on cultural resources is expected because the proposed amendments apply to existing operations involving the use of solvents and surface coatings, most of which take place within existing facilities. In addition, no construction outside existing facilities is expected. The proposed amendments neither require nor are likely to result in activities that would affect historical, archaeological, or paleontological resources. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
VI. 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:				
1. 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? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Strong seismic groundshaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The BAAQMD covers all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties, and portions of western Solano and southern Sonoma Counties. The land uses and affected environment vary substantially throughout the area. Rule 4 applies to the use of solvent for wipe cleaning

operations (and other surface coating and solvent emitting operations) that are not specifically subject to any other Regulation 8 rule. The proposed VOC standards for surface preparation solvent in Rules 14, 19, 31, and 43 will reduce emissions from substrates and products specifically subject to these rules, and the same proposed standards in Rule 4 will reduce wipe cleaning emissions from substrates and products exempted from or not covered by other rules. There are approximately 640 permitted facilities affected by these rules within the BAAQMD. In addition to manufacturing and facilities that are engaged in coating or cleaning metal and plastic parts and products separate from the manufacturer, the proposed amendments may affect machine shops, metal platers, and other treatment facilities. The majority of affected stationary sources occur in areas zoned for industrial or commercial land use. Typically, these facilities are surrounded by other commercial and industrial facilities. Because this is a rule revision and affected sources have been previously identified, BAAQMD has an inspection and tracking program that monitors compliance at the affected facilities.

Discussion of Impacts

- a-e. No effect on geology and soils is expected because the proposed amendments apply to existing operations involving the use of solvents, most of which take place within existing facilities. In addition, no construction outside existing facilities is expected. The proposed amendments neither require nor are likely to result in activities that would affect geology and soils. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
VII. HAZARDS AND HAZARDOUS MATERIALS.				
Would the project:				
a.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area?				
f.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area?				
g.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
h.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?				

Setting

As stated under “Air Quality,” BAAQMD regulates air contaminants from stationary sources. It is governed by a 21-member Board of Directors composed of publicly elected officials apportioned according to the population of the represented counties. The board has the authority to develop and enforce regulations for the control of air pollution within its jurisdiction. (Bay Area Air Quality Management District 2001b.)

The Inspection Program of the Compliance and Enforcement Division routinely conducts inspections and audits to ensure compliance with applicable federal, state, and BAAQMD regulations. Source categories include refineries, chemical plants, semiconductor manufacturing facilities, dry cleaners, ink and coating operations, gasoline dispensing facilities, and asbestos demolition and renovation. BAAQMD also regulates any other activities that result in the emission of air contaminants that interfere with attainment and maintenance of health-based air quality standards or may cause a public nuisance. (Bay Area Air Quality Management District 1999.)

In addition to the inspection and compliance programs of the BAAQMD, hazards and hazardous materials are regulated by a variety of agencies under various laws and regulations. Brief descriptions of the applicable regulations for hazards and hazardous materials are listed below.

Regulatory Setting

A hazardous material is defined by the California Department of Toxic Substances Control (DTSC) as a material that poses a significant present or potential hazard to human health and safety or the environment if released because of its quantity, concentration, or physical or chemical characteristics (26 California Code of Regulations [CCR] 25501). For the purposes of this analysis, hazardous materials include raw materials, and hazardous waste includes waste generated by facilities and businesses or waste material remaining onsite as a result of past activities. Regulations and policies considered relevant to the proposed amendments are summarized below.

Federal Regulations

The principal federal regulatory agency responsible for the safe use and handling of hazardous materials is EPA. Two key federal regulations pertaining to hazardous wastes are described below. Other applicable federal regulations are contained primarily in 29, 40, and 49 Code of Federal Regulations.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act enables EPA to administer a regulatory program that extends from the manufacture of hazardous materials to disposal, thus regulating the generation, transportation, treatment, storage, and disposal of hazardous waste at all facilities and sites in the nation.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act, also known as Superfund, was passed to facilitate the cleanup of the nation's toxic waste sites. In 1986, Superfund was amended by the Superfund Amendment and Reauthorization Act Title III (community right-to-know laws). Title III states that past and present owners of land contaminated with hazardous substances can be held liable for the entire cost of the cleanup, even if the material was dumped illegally when the property was under different ownership.

State Regulations

California regulations are equal to or more stringent than federal regulations. EPA has granted the state primary oversight responsibility to administer and enforce hazardous waste management programs. State regulations require planning and management to ensure that hazardous wastes are handled, stored, and disposed of properly to reduce risks to human health and the environment. Several key laws pertaining to hazardous wastes are discussed below.

Hazardous Materials Release Response Plans and Inventory Act

The Hazardous Materials Release Response Plans and Inventory Act, also known as the Business Plan Act, requires businesses using hazardous materials to prepare a plan that describes their facilities, inventories, emergency response plans, and training programs. Hazardous materials are defined as raw or unused materials that are part of a process or manufacturing step. They are not considered to be hazardous waste. Health concerns pertaining to the release of hazardous materials, however, are similar to those relating to hazardous waste.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the state hazardous waste management program, which is similar to, but more stringent than, the federal Resource Conservation and Recovery Act program. The act is implemented by regulations

contained in 26 CCR, which describes the following required aspects for the proper management of hazardous waste:

- identification and classification;
- generation and transportation;
- design and permitting of recycling, treatment, storage, and disposal facilities;
- treatment standards;
- operation of facilities and staff training; and
- closure of facilities and liability requirements.

These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and 26 CCR, the generator of hazardous waste must complete a manifest that accompanies the waste from the generator to the transporter to the ultimate disposal location. Copies of the manifest must be filed with DTSC.

Emergency Services Act

Under the Emergency Services Act, the state developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an important part of the plan, which is administered by the California Office of Emergency Services. The office coordinates the responses of other agencies, including EPA, the California Highway Patrol, regional water quality control boards, air quality management districts, and county disaster response offices.

Other Laws, Regulations, and Programs

Various other state regulations have been enacted that affect hazardous waste management, including:

- Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65), which requires labeling of substances known or suspected by the state to cause cancer; and
- California Government Code Section 65962.5, which requires the Office of Permit Assistance to compile a list of possible contaminated sites in the state.

State and federal regulations also require that hazardous materials sites be identified and listed in public records. These lists include:

- Comprehensive Environmental Response, Compensation, and Liability Information System;

- National Priorities List for Uncontrolled Hazardous Waste Sites;
- Resource Conservation and Recovery Act;
- California Superfund List of Active Annual Workplan Sites; and
- lists of state-registered underground and leaking underground storage tanks.

Discussion of Impacts

- a-c. Use of glycol ethers in general solvent and surface coating operations could increase as a result of the proposed amendments. Glycol ethers are a class of water-soluble compounds often used for cleaning formulations (including household cleaners). Propylene glycol monomethyl ether (PGME) is used as a solvent for water-based paints, dyes, and stains, and is also used in pesticides and paint remover. PGME has a sweet odor, low vapor pressure, and is soluble in water and VOC-exempt acetone. PGME is readily absorbed through the skin. The National Institute for Occupational Safety and Health and the American Council of Governmental Industrial Hygienists have set thresholds and exposure limits for this compound, but the Occupational Health and Safety Administration has not set an exposure limit as it has for other glycol ethers. PGME is considered less hazardous than other glycol ethers.

Under the proposed amendments, water-soluble compounds such as PGME may be substituted for organic solvents in an effort to create low-VOC cleaning products. This could result in increased exposure of workers engaged in general solvent and surface coating operations to hazardous or toxic solvents. A cleaning solution using water-soluble compounds such as glycol ethers would contain only approximately 5-7% by weight of any organic solvent. The industrial facilities that would use low-VOC cleaners would be required to adhere to the existing thresholds and exposure limits for glycol ether compounds. These values are stated in terms of a concentration in a workroom atmosphere. Given the number of hazardous materials in existing coatings and solvents, and the very stringent thresholds and exposure limits associated with some compounds, it is expected that facilities involved in surface coating or solvent cleaning are already well aware of ventilation standards and hazard protection procedures for workers. Therefore, this impact is considered less than significant.

In addition, the use of acetone, a highly flammable substance, as a wipe cleaning solvent could increase as a result of the proposed amendments. Although acetone is highly flammable, the flammability rating given it by the fire safety code is the same as given typically to paint thinners or most other solvents, and therefore the storage, use, and disposal requirements are identical. Because facilities already have safety precautions in place for use of such solvents, such as the use of grounded electrical equipment and isolated separate storage lockers, and coating and chemical suppliers

provide precautionary instructions for handling and storage, this impact is considered less than significant.

- d-f, h. The proposed amendments apply to existing operations involving use of solvents and surface coatings, most of which take place within existing facilities. In addition, no construction outside existing facilities is anticipated. Therefore, no impacts are anticipated that would affect schools, existing hazardous material sites, wildlands, airport use plans, or people residing or working within the vicinity of a private airstrip.
- g. The proposed amendments are not anticipated to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	
VIII. HYDROLOGY AND WATER QUALITY.					
Would the project:					
a.	Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in 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 that 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 the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation onsite or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Substantially alter the existing drainage pattern of the site or area, including through the 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 flooding onsite or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	Place housing 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h.	Place within a 100-year flood hazard area structures that would impede or redirect floodflows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
j.	Contribute to inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The BAAQMD covers all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties, and portions of western Solano and southern Sonoma Counties. The land uses and affected environment vary substantially throughout the area. Rule 4 applies to the use of solvent for wipe cleaning operations (and other surface coating and solvent emitting operations) that are not specifically subject to any other Regulation 8 rule. The proposed VOC standards for surface preparation solvent in Rules 14, 19, 31, and 43 will reduce emissions from substrates and products specifically subject to these rules, and the same proposed standards in Rule 4 will reduce wipe cleaning emissions from substrates and products exempted from or not covered by other rules. There are approximately 640 permitted facilities affected by these rules within the BAAQMD. In addition to manufacturing and facilities that are engaged in coating or cleaning metal and plastic parts and products separate from the manufacturer, the proposed amendments may affect machine shops, metal platers, and other treatment facilities. The majority of affected stationary sources occur in areas zoned for industrial or commercial land use. Typically, these facilities are surrounded by other commercial and industrial facilities. Because this is a rule revision and affected sources have been previously identified, BAAQMD has an inspection and tracking program that monitors compliance at the affected facilities. In addition, many facilities are already inspected by county health departments or local fire departments.

Discussion of Impacts

- a. As discussed under “Hazards and Hazardous Materials”, the use of water-soluble compounds such as glycol ethers may increase as a result of the proposed amendments. Disposal of such water-soluble compounds in storm drain sewage systems could potentially affect wastewater systems. Some water-soluble cleaners are advertised as “sewer safe,” but those contaminated with oils, greases, and metal fines cannot be disposed of in sewers—existing regulations prohibit discharge of contaminated solutions into the wastewater system. Consequently, the proposed amendments are not anticipated to violate water quality standards or waste discharge requirements. This impact is considered less than significant.
- b–j. The proposed amendments have no provision that would require the construction of additional water resource facilities, would not result in the

need for new or expanded water entitlements, or would not result in an alteration of drainage patterns. The proposed amendments would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. The proposed amendments would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. No effect on hydrology or water quality is expected because the proposed amendments apply to existing operations involving the use of solvents and surface coatings, most of which take place within existing facilities. In addition, no construction outside existing facilities is expected. The proposed amendments neither require nor are likely to result in activities that would affect hydrology and water quality. Therefore, there is no impact.

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

Setting

The BAAQMD covers all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties, and portions of western Solano and southern Sonoma Counties. The land uses and affected environment vary substantially throughout the area. Rule 4 applies to the use of solvent for wipe cleaning operations (and other surface coating and solvent emitting operations) that are not specifically subject to any other Regulation 8 rule. The proposed VOC standards for surface preparation solvent in Rules 14, 19, 31, and 43 will reduce emissions from substrates and products specifically subject to these rules, and the same proposed standards in Rule 4 will reduce wipe cleaning emissions from substrates and products exempted from or not covered by other rules. There are approximately 640 permitted facilities affected by these rules within the BAAQMD. In addition to manufacturing and facilities that are engaged in coating or cleaning metal and plastic parts and products separate from the manufacturer, the proposed amendments may affect machine shops, metal platers, and other treatment facilities. The majority of affected stationary sources occur in areas zoned for industrial or commercial land use. Typically, these facilities are surrounded by other commercial and industrial facilities. Because this is a rule revision and affected sources have been previously identified, BAAQMD has an inspection and tracking program that monitors compliance at the affected facilities.

Discussion of Impacts

- a-c. No effects on land use and planning or conflicts with land use plans and policies are expected because the proposed amendments apply to existing operations involving use of solvents and surface coatings, most of which

take place within existing facilities. In addition, no construction outside existing facilities is expected. The proposed amendments do not call for any changes in locally adopted general plans or require zoning ordinance changes or modifications. Therefore, there is no impact.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
X.	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"/>

Setting

The BAAQMD covers all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties, and portions of western Solano and southern Sonoma Counties. The land uses and affected environment vary substantially throughout the area. Rule 4 applies to the use of solvent for wipe cleaning operations (and other surface coating and solvent emitting operations) that are not specifically subject to any other Regulation 8 rule. The proposed VOC standards for surface preparation solvent in Rules 14, 19, 31, and 43 will reduce emissions from substrates and products specifically subject to these rules, and the same proposed standards in Rule 4 will reduce wipe cleaning emissions from substrates and products exempted from or not covered by other rules. There are approximately 640 permitted facilities affected by these rules within the BAAQMD. In addition to manufacturing and facilities that are engaged in coating or cleaning metal and plastic parts and products separate from the manufacturer, the proposed amendments may affect machine shops, metal platers, and other treatment facilities. The majority of affected stationary sources occur in areas zoned for industrial or commercial land use. Typically, these facilities are surrounded by other commercial and industrial facilities. Because this is a rule revision and affected sources have been previously identified, BAAQMD has an inspection and tracking program that monitors compliance at the affected facilities.

Discussion of Impacts

- a-b. No effect on mineral resources is expected because the proposed amendments apply to existing operations involving use of solvents and surface coatings. The proposed amendments are not expected to result in the use of any mineral resource in formulating or applying solvents and surface coatings. Therefore, there is no impact.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XI. NOISE.					
	Would the project:				
a.	Expose persons to or generate noise levels in excess of standards established in a 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.	Expose persons to or generate excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Result in a substantial permanent 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"/>
d.	Result in 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"/>
e.	Be located within an airport land use plan area, or, where such a plan has not been adopted, within two miles of a public airport or public use airport and 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"/>
f.	Be located in the vicinity of a private airstrip and 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"/>

Setting

Rule 4 applies to the use of solvent for wipe cleaning operations (and other surface coating and solvent emitting operations) that are not specifically subject to any other Regulation 8 rule. The proposed VOC standards for surface preparation solvent in Rules 14, 19, 31, and 43 will reduce emissions from substrates and products specifically subject to these rules, and the same proposed standards in Rule 4 will reduce wipe cleaning emissions from substrates and products exempted from or not covered by other rules. There are approximately 640 permitted facilities affected by these rules within the BAAQMD. In addition to manufacturing and facilities that are engaged in coating or cleaning metal and plastic parts and products separate from the manufacturer, the proposed amendments may affect machine shops, metal platers, and other treatment facilities. These facilities operate their wipe cleaning operations within the confines of buildings, buffering noise from surrounding receptors. The facilities are primarily located in areas zoned for commercial or industrial uses, and are not

commonly adjacent to noise-sensitive land uses, which are generally defined as locations where people reside or locations where the presence of unwanted sound could adversely effect the use of the land. Noise-sensitive land uses typically include residences, hospitals, schools, libraries, and certain types of recreational uses. Noise levels associated with solvent cleaning operations are not considered significant.

Discussion of Impacts

- a-f. No effect on noise is expected because the proposed amendments apply to existing operations involving use of solvents and surface coatings, most of which take place within existing facilities. In addition, no activities or construction outside existing facilities are expected. Because solvents and surface coatings typically are applied within existing buildings, the proposed amendments are not expected to result in any increases in existing noise levels or exposure of people to severe noise levels. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XII. POPULATION AND HOUSING.				
Would the project:				
a. Induce substantial population growth in an area, either directly (e.g., 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 a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace a substantial number of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The BAAQMD covers all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties, and portions of western Solano and southern Sonoma Counties. The land uses and affected environment vary substantially throughout the area. Rule 4 applies to the use of solvent for wipe cleaning operations (and other surface coating and solvent emitting operations) that are not specifically subject to any other Regulation 8 rule. The proposed VOC standards for surface preparation solvent in Rules 14, 19, 31, and 43 will reduce emissions from substrates and products specifically subject to these rules, and the same proposed standards in Rule 4 will reduce wipe cleaning emissions from substrates and products exempted from or not covered by other rules. There are approximately 640 permitted facilities affected by these rules within the BAAQMD. In addition to manufacturing and facilities that are engaged in coating or cleaning metal and plastic parts and products separate from the manufacturer, the proposed amendments may affect machine shops, metal platers, and other treatment facilities. The majority of affected stationary sources occur in areas zoned for industrial or commercial land use. Typically, these facilities are surrounded by other commercial and industrial facilities. Because this is a rule revision and affected sources have been previously identified, BAAQMD has an inspection and tracking program that monitors compliance at the affected facilities.

Discussion of Impacts

- a-c. No effect on population and housing is expected because the proposed rule amendments apply to existing operations involving use of solvents and

surface coatings, most of which take place within existing facilities. In addition, no construction outside existing facilities is expected. The proposed amendments will not induce population growth or related housing development, or displace housing or people. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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XIII. PUBLIC SERVICES.

Would the project:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental 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:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The BAAQMD covers all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties, and portions of western Solano and southern Sonoma Counties. The land uses and affected environment vary substantially throughout the area. Rule 4 applies to the use of solvent for wipe cleaning operations (and other surface coating and solvent emitting operations) that are not specifically subject to any other Regulation 8 rule. The proposed VOC standards for surface preparation solvent in Rules 14, 19, 31, and 43 will reduce emissions from substrates and products specifically subject to these rules, and the same proposed standards in Rule 4 will reduce wipe cleaning emissions from substrates and products exempted from or not covered by other rules. There are approximately 640 permitted facilities affected by these rules within the BAAQMD. In addition to manufacturing and facilities that are engaged in coating or cleaning metal and plastic parts and products separate from the manufacturer, the proposed amendments may affect machine shops, metal platers, and other treatment facilities. The majority of affected stationary sources occur in areas zoned for industrial or commercial land use. Typically, these facilities are surrounded by other commercial and industrial facilities.

Given the large area covered by the BAAQMD, public services are provided by a wide range of entities. Fire protection and police protection/law enforcement

services within the BAAQMD is provided by various districts, organizations, and agencies. There are several school districts, private schools, and park departments within the BAAQMD. Public facilities within the BAAQMD are managed by different county, city, and special-use districts.

Discussion of Impacts

- a. No effects related to public services are anticipated because the proposed amendments apply to existing operations involving use of solvents and surface coatings, most of which take place within existing facilities. No new or additional public services such as police, fire, schools, or public roadway maintenance would be required as a consequence of the amendments. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XIV. RECREATION.				
Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

Given the large area covered by the BAAQMD, there are many recreation areas and districts within the affected area.

Discussion of Impacts

- a-b. No effect on recreation is expected because the proposed amendments apply to existing operations involving use of solvents and surface coatings, most of which take place in existing facilities. In addition, no construction or expansion of recreational facilities would occur. The amendments neither require nor are likely to result in activities that would affect recreation. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XV. TRANSPORTATION/TRAFFIC.				
Would the project:				
a. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause, either individually or cumulatively, exceedance of a level-of-service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

Transportation infrastructure within the BAAQMD ranges from single-lane roadways to multilane interstate highways. Transportation systems between major hubs are located within and outside the BAAQMD, including railroads, airports, waterways, and highways. Localized modes of travel include personal vehicles, busses, bicycles, and walking. Transportation to and from the facilities subject to the proposed amendments varies by facility location.

Discussion of Impacts

- a–g. No effect on transportation or traffic patterns is expected because the proposed amendments apply to existing operations involving use of solvents and surface coatings, most of which take place within existing facilities. No expansion of use is anticipated. No construction inside or outside existing facilities is expected, and no changes in transportation or pedestrian and vehicular circulation are anticipated. In addition, where these amendments would require a facility to change the solvents or surface coatings used, the facility is most likely to comply by substituting one solvent or surface coating for another, and therefore will not require additional shipments. Therefore, there is no impact.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XVI. UTILITIES AND SERVICE SYSTEMS.					
Would the project:					
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Require or result in the construction of new water or wastewater treatment 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"/>
c.	Require or result in the construction of new stormwater 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"/>
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or would new or expanded entitlements be needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Result in a determination by the wastewater treatment provider that 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"/>
f.	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"/>
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The BAAQMD covers all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties, and portions of western Solano and southern Sonoma Counties. The land uses and affected environment vary substantially throughout the area. Rule 4 applies to the use of solvent for wipe cleaning operations (and other surface coating and solvent emitting operations) that are not specifically subject to any other Regulation 8 rule. The proposed VOC standards for surface preparation solvent in Rules 14, 19, 31, and 43 will reduce emissions from substrates and products specifically subject to these rules, and the same proposed standards in Rule 4 will reduce wipe cleaning emissions from substrates and products exempted from or not covered by other rules. There are

approximately 640 permitted facilities affected by these rules within the BAAQMD. In addition to manufacturing and facilities that are engaged in coating or cleaning metal and plastic parts and products separate from the manufacturer, the proposed amendments may affect machine shops, metal platers, and other treatment facilities. The majority of affected stationary sources occur in areas zoned for industrial or commercial land use. Typically, these facilities are surrounded by other commercial and industrial facilities. Because this is a rule revision and affected sources have been previously identified, BAAQMD has an inspection and tracking program that monitors compliance at the affected facilities.

Discussion of Impacts

- a-g. No effect on utilities and service systems is expected because the proposed amendments apply to existing operations involving use of solvents and surface coatings, most of which take place within existing facilities. No expansion would be required. No increases in demand for public utilities are expected as a result of the proposed amendments. Therefore, there is no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XVII. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project have impacts that are individually limited but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

Discussion of Impacts

- a. The proposed amendments do not 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.
- b–c. The reduction of emissions of VOCs from the use of solvents and surface coatings is part of a long-term plan to bring the Bay Area into compliance with the NAAQS and SAAQS for ozone. The proposed amendments do not have adverse environmental impacts that are limited individually, but cumulatively considerable when considered in conjunction with other regulatory control projects. They do not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Chapter 4

References Cited

Bay Area Air Quality Management District. 1999. BAAQMD inspection program. Available at URL: <<http://www.baaqmd.gov/enf/inspect/inspect.htm>>. Last updated July 7, 1999.

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