

**Draft Environmental Impact Report for the
Proposed Amendments to
Bay Area Air Quality Management District
NSR and Title V Permitting Regulations**

September 4, 2012

Prepared for:

Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Contact: Carol Lee
(415) 749-4689

Prepared By:

Environmental Audit, Inc.
1000-A Ortega Way
Placentia, CA 92870
Contact: Debra Bright Stevens
(714) 632-8521

DRAFT ENVIRONMENTAL IMPACT REPORT
PROPOSED AMENDMENTS TO
BAY AREA AIR QUALITY MANAGEMENT DISTRICT
NSR AND TITLE V PERMITTING REGULATIONS

TABLE OF CONTENTS

	Page No.
CHAPTER 1 – INTRODUCTION AND EXECUTIVE SUMMARY	
1.0 Introduction	1-1
1.1 California Environmental Quality Act	1-2
1.2 Notice of Preparation and Initial Study	1-2
1.3 Type of EIR	1-2
1.4 Intended Uses of This Document	1-3
1.5 Areas of Controversy.....	1-4
1.6 Project Objectives.....	1-4
1.7 Document Format.....	1-4
1.8 Executive Summary of Draft EIR	1-5
1.8.1 Executive Summary – Chapter 2: Project Description	1-5
1.8.2 Executive Summary – Chapter 3: Environmental Setting, Impacts and Mitigation Measures	1-11
1.8.3 Executive Summary – Chapter 4: Alternatives.....	1-21
1.8.4 Executive Summary – Chapter 5: References	1-23
CHAPTER 2 – PROJECT DESCRIPTION	
2.1 Introduction	2-1
2.2 Project Location	2-2
2.3 Project Objectives.....	2-4
2.4 Background and Project Description.....	2-5
2.4.1 “New Source Review” and Title V Permitting.....	2-5
2.4.2 The District’s Current New Source Review and Title V Programs.....	2-10
2.4.3 Recent Regulatory Developments.....	2-11
2.4.4 Proposed Amendments to Regulation 2.....	2-15
CHAPTER 3 – ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES AND CUMULATIVE IMPACTS	
3.0 Introduction and Summary of Conclusions.....	3-1
3.0 Format of Analysis	3-1
3.1.1 Environmental Setting	3-1
3.1.2 Thresholds of Significance	3-2
3.1.3 Environmental Impacts	3-2

	Page No.
3.1.4 Mitigation Measures	3-3
3.1.5 Cumulative Impacts	3-3
3.2 Air Quality.....	3-3
3.2.1 Environmental Setting	3-3
3.2.2 Thresholds of Significance	3-20
3.2.3 Environmental Impacts	3-24
3.2.4 Mitigation Measures	3-40
3.2.5 Cumulative Impacts	3-40
3.2.6 Air Quality Impacts Conclusions.....	3-43
3.3 Greenhouse Gas Emissions	3-44
3.3.1 GHG Environmental Setting.....	3-44
3.3.2 Existing GHG Regulatory Setting	3-47
3.3.3 Thresholds of Significance	3-48
3.3.4 Environmental Impacts	3-49
3.3.5 Cumulative GHG Environmental Impacts.....	3-49
3.3.6 Mitigation Measures	3-55
3.3.7 Air Quality Impacts Conclusions.....	3-55
3.4 Growth Inducing Impacts.....	3-56
3.4.1 Introduction.....	3-56
3.4.2 Economic and Population Growth, and Related Public Services	3-56
3.4.3 Removal of Obstacles to Growth.....	3-57
3.4.4 Development or Encroachment into Open Space	3-57
3.4.5 Precedent Setting Action.....	3-58
3.4.6 Conclusion	3-
3.5 Significant Environmental Effects Which Cannot Be Avoided and Significant Irreversible Environmental Changes	3-58
3.6 Environmental Effects Not Found to be Significant	3-58

CHAPTER 4 – ALTERNATIVES

4.0 Alternatives Analysis	4-1
4.1 Discussion of Alternatives.....	4-1
4.2 Description of Project Alternatives	4-3
4.2.1 Alternative 1 – No Project Alternative.....	4-3
4.2.2 Alternative 2 – No Banking Provisions for PM _{2.5} Offsets	4-3
4.2.3 Alternative 3 – Using “NSR Reform” For PSD Permitting	4-4
4.3 Environmental Impacts of Project Alternatives	4-6
4.3.1 Alternative 1 – No Project Alternative.....	4-6
4.3.2 Alternative 2 – No Banked Credits for PM _{2.5} Offsets.....	4-6
4.3.3 Alternative 3 – “NSR Reform” Applicability Tests	4-7
4.4 Conclusions	4-7

CHAPTER 5 – REFERENCES

5.1	References	5-1
5.2	Organizations and Persons Consulted	5-2
5.3	List of Environmental Impact Report Preparers.....	5-3

Table of Contents

Page No.

FIGURES:

Figure 2-1: Location of Bay Area Air Quality Management District..... 2-3

TABLES:

Table 3-1: Federal and State Ambient Air Quality Standards..... 3-5
Table 3-2: Bay Area Air Pollution Summary – 2010..... 3-6
Table 3-3: Bay Area Air Quality Summary Days over Standards 3-7
Table 3-4: Summary of BAAQMD Ambient Air Toxics Monitoring Data..... 3-12
Table 3-6: Emission Reductions of Proposed Control Measures (2020 Estimates)..... 3-41
Table 3-7: California GHG Emissions and Sinks Summary 3-45
Table 3-8: Bay Area Greenhouse Gas Emission Inventory Projections..... 3-46

APPENDICES:

Appendix A: Notice of Preparation and Initial Study (NOP/IS)
Appendix B: Proposed Rule Amendments