

NESHAP compliance test, and Hexavalent Chromium was less than 10% of the Total. The test run was conducted under their current permit condition of no more than 8 tons of Pet Coke and 12 tons of Coal. Gina also did commit lower the percentage of PetCoke to less than 100% if the source test resulted in a recalculated risk of greater than 1 in a million. It is my understanding from what Scott told me earlier today that the risk is currently at 1.3 in a million and the Hexavalent to Total Chromium ratio on 100% Pet Coke would need to be 64% or less. Should you have any questions let me know.

From: Eric Chan [mailto:echan@baaqmd.gov]
Sent: Wednesday, April 18, 2007 2:59 PM
To: Wolf, Doug
Cc: Janet Stromberg; Glen Long
Subject: RE: Modeling Results

Doug,

I will try to use Reg 2-1-312.11.4 to exempt this project from CEQA.

2-1-312 Other Categories of Exempt Projects: In addition to ministerial projects, the following categories of projects subject to permit review by the District will be exempt from the CEQA review, either because the category is exempted by the express terms of CEQA (subsections 2-1-312.1 through 312.9) or because the project has no potential for causing a significant adverse environmental impact (subsections 2-1-312.10 and 312.11). Any permit applicant wishing to qualify under any of the specific exemptions set forth in this Section 2-1-312 must include in its permit application CEQA-related information in accordance with subsection 2-1-426.1. In addition, the CEQA-related information submitted by any permit applicant wishing to qualify under subsection 2-1-312.11 must demonstrate to the satisfaction of the APCO that the proposed project has no potential for resulting in a significant environmental effect in connection with any of the environmental media or resources listed in Section II of Appendix I of the State CEQA Guidelines.

11.4 Projects satisfying the "no net emission increase" provisions of District Regulation 2, Rule 2 for which there will be some increase in the emissions of any toxic air contaminant, but for which the District staff's health risk screening analysis shows that the project will not result in a cancer risk (as defined in Regulation 2-5-206) greater than 1.0 in a million (10^{-6}) and will not result in a chronic hazard index (as defined in Regulation 2-5-208) greater than 0.20, and for which there will be no other significant environmental effect.

so the chronic hazard index should be less than 0.20 also. I had thought the project would easily pass the risk screen.

I think there was enough info in the application for a prelim environmental study.

Eric