Bay Area Air District

APPENDIX D

Final Addendum to the Environmental Impact Report for Rule 11-18

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BAY AREA AIR DISTRICT

Final Addendum to the Environmental Impact Report for Regulation 11: Hazardous Pollutants, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities

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1.0 INTRODUCTION

Regulation 11: Hazardous Pollutants, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities (Rule 11-18) was adopted by the Bay Area Air District (Air District) in 2017 to address facilities whose emissions of toxic air contaminants (TACs) pose an elevated risk to nearby residents and workers. The purpose of Rule 11-18 was to prioritize existing facilities with the highest health impacts across the Bay Area and require them to reduce those impacts. Rule 11-18 required existing facilities with health risks above specified risk action level (RAL) thresholds to either reduce those health risks below the Rule's risk action thresholds or implement Best Available Retrofit Control Technology for Toxics (TBARCT) on all significant sources of health risks.

Since the approval of Rule 11-18, concerns have been raised regarding delays in Rule 11-18 implementation, including the finalization of health risk assessments (HRAs) and the development, submission, and approval of Risk Reduction Plans (RRPs). These concerns about Rule 11-18 were raised at multiple Air District Stationary Source Committee meetings, and community members voiced similar concerns at Assembly Bill (AB) 617 Community Steering Committee meetings. Additionally, the Richmond-North Richmond-San Pablo Path to Clean Air (PTCA) includes a strategy to improve Rule 11-18, including rule amendments to improve efficiency and transparency. To address these needs, the Air District anticipates developing amendments to Rule 11-18 (the proposed project or Modified Project) in two phases:

- Phase 1 (current): focused on procedural improvements and implementation efficiency;
- Phase 2 (future): focused on evaluating and potentially increasing rule stringency.

The Air District is currently developing the Phase 1 amendments to Rule 11-18. The Air District does not yet have a timeline for Phase 2 or set of potential rule amendments that it intends to include in Phase 2, but it anticipates beginning to conduct an analysis of the rule's stringency and other more substantive aspects of the rule after Phase 1 is complete.

2.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT AND BASIS FOR DECISION TO PREPARE AN ADDENDUM

The Air District's review and approval of the currently proposed modifications to Rule 11-18 is a discretionary action subject to CEQA. When Rule 11-18 was originally proposed, the Air District was considered the Lead Agency under CEQA and prepared and certified an Environmental Impact Report (EIR) for the Rule (Approved Project). Feasible mitigation measures to address the potentially significant adverse impacts were identified in the EIR. Findings were made and a Statement of Overriding Considerations was adopted by the Air District.

Adoption of Rule 11-18 was considered a "project" subject to CEQA and the environmental impacts of the project were evaluated in the EIR. The currently proposed modifications to Rule 11-18 are also subject to CEQA. CEQA requires evaluation of the potential adverse environmental impacts of proposed projects and identification of feasible methods to reduce or avoid identified significant adverse environmental impacts of those projects. However, CEQA Guidelines Section

15164(a) allows the preparation of an Addendum to a previously certified EIR if some changes or additions are necessary but none of the following conditions as described in CEQA Guidelines Section 15162 occur:

- Substantial changes which will require major revisions of the previous CEQA document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- Substantial changes, with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous CEQA document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or,

- New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous CEQA document was certified as complete, shows any of the following:

  – The project will have one or more significant effects not discussed in the previous CEQA document;

  – Significant effects previously examined will be substantially more severe than shown in the previous CEQA document;

  – Identification of mitigation measures or alternatives previously found not to be feasible, but would in fact be feasible, and would substantially reduce one or more significant effects, but the project proponent declines to adopt the mitigation measure or alternatives; or

  – Identification of mitigation measures or alternatives which are considerably different from those analyzed in the previous CEQA document would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measure or alternative.

To determine whether the conditions described in CEQA Guidelines Section 15162 have occurred, the effects of the proposed modifications to Rule 11-18 were compared to the baseline or the existing setting of the environmental impacts described in the original EIR.

As concluded in Section 6.0 of this Addendum, the currently proposed modifications to Rule 11-18 do not change the conclusions reached in the EIR. The EIR concluded that significant adverse impacts are expected to occur for the topics of: 1) construction air quality impacts for ROG, NOx, PM_{10} and $PM_{2.5}$ emissions; 2) greenhouse gas impacts associated with the implementation of air pollution control equipment for the reduction of TAC emissions under proposed Rule 11-18, as well as cumulative GHG emission impacts; and 3) water demand impacts associated with implementation of air pollution control equipment, as well as cumulative water demand impacts. As explained in Subsections 6.1 through 6.4 of this Addendum, the currently proposed modifications to Rule 11-18 will neither increase the severity of these significant adverse impacts nor result in new significant adverse impacts beyond those previously identified in the EIR.

Further, the Air District is also not aware of any other occurrence, such as a change in circumstances or the existence of new information, that would warrant additional environmental review under CEQA Guidelines Section 15162.

The analysis in Sections 6.0 and 7.0 of this Addendum supports the conclusion that the currently proposed revisions to Rule 11-18 are not expected to trigger any conditions identified in CEQA Guidelines Section 15162 that would require the preparation of a subsequent EIR. Therefore, when considering the effects of the Modified Project, the Air District has determined that an Addendum is the appropriate type of CEQA document to be prepared for evaluating potential environmental impacts.

The previous paragraphs and the impact analyses in Sections 6.0 and 7.0 of this Addendum provide the rationale to comply with CEQA Guidelines Section 15164(e) which requires a brief explanation supported by substantial evidence to be included in the Addendum about the reasoning behind the decision to not prepare a subsequent EIR or supplemental EIR under Guidelines Sections 15162 and 15163, respectively. Although CEQA contains a presumption of finality after an EIR is certified, because there are proposed changes to the Approved Project that require discretionary action by the Air District, this Addendum is appropriate. Finally, pursuant to CEQA Guidelines Section 15164(c), "an addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration," but the Air District is circulating this Addendum for review to ensure the public and regulated entities have an opportunity to provide any input prior to finalization.

3.0 CEQA DOCUMENTS PREPARED FOR RULE 11-18

This section provides summaries of the activities associated with Rule 11-18 that were evaluated in CEQA documents, which are presented in sequential order. The CEQA documents can be downloaded from the Air District Webpage at: https://www.baaqmd.gov/en/rules-and-compliance/rules/regulation-11-rule-18-reduction-of-risk-from-air-toxic-emissions-at-existing-facilities?rule_version=Adopted.

October 2016 Notice of Preparation of an Environmental Impact Report and Initial Study (Air District, 2016): The Air District prepared an Initial Study (IS) and published a Notice of Preparation (NOP) for Regulation 11: Hazardous Pollutants, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities (Rule 11-18) and Regulation 12: Miscellaneous Standard of Performance, Rule 16: Petroleum Refining Facility-Wide Emissions Limits (Rule 12-16). The NOP/IS were released for a 30-day public review and comment period on October 14, 2016. The NOP/IS included a project description, project location, and a preliminary discussion of potential adverse environmental impacts. The NOP requested public agencies and other interested parties to comment on the scope and content of the environmental information to be evaluated in the Draft EIR. Public scoping meetings were held on November 14, 2016 and November 16, 2016.

March 2017 Draft EIR (Air District, 2017a): The Air District prepared a Draft EIR, which it released for a 45-day public review and comment period from March 24, 2017 through May 8, 2017. The Draft EIR included a project description, a description of the existing environmental setting, a preliminary analysis of potential adverse environmental impacts (including cumulative

impacts) for each environmental topic that could be adversely affected by the proposed project, mitigation measures, project alternatives, and all other relevant topics required by CEQA. The Draft EIR also included a copy of the October 2016 NOP/IS (Appendix NOP). The Draft EIR concluded that the Project would have significant and unavoidable impacts associated with: 1) air quality impacts during construction activities (NOx emissions) and operational emissions of NOx; 2) greenhouse gas emissions; 3) transportation and use of hazardous materials; and 4) water demand impacts.

The Project would result in less than significant impacts following mitigation for: 1) construction air quality emissions associated with ROG, PM_{10} and $PM_{2.5}$ and odor impacts; and 2) hazard impacts.

Impacts to all other environmental topic areas were concluded to be less than significant.

September 2017, Draft EIR (Air District, 2017b): An additional Draft EIR for Proposed District Regulation 11, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities was released for public review from September 1, 2017 to October 16, 2017. The revised Draft EIR eliminated the review of proposed Air District Rule 12-16.

The Draft EIR discussed proposed revisions to Rule 11-18 and potential air quality impacts associated with implementation of the Rule. . The revised Draft EIR concluded that construction air quality impacts would be significant for ROG, NOx, PM_{10} and $PM_{2.5}$ emissions with implementation of Rule 11-18 due to the potential construction overlap associated with facilities that would be required to comply with the Rule. Operational air quality impacts were concluded to be less than significant. Greenhouse gas impacts associated with the implementation of air pollution control equipment for the reduction of TAC emissions under proposed Rule 11-18 were found to be significant, as well as cumulatively significant. Finally, water demand impacts during the implementation of Rule 11-18 were also considered to be cumulatively considerable and found to be potentially significant following mitigation.

November 2017, Recirculated Final EIR, Regulation 11-18: Reduction of Risk from Air Toxic Emissions at Existing Facilities (Air District, 2017c): The Recirculated Final EIR was approved and Rule 11-18 was adopted by the Air District Board of Directors on November 14, 2017. Responses to comments were prepared and minor modifications to the Recirculated Final EIR were made. The changes that were reflected in the Final EIR did not constitute significant new information relating to the environmental analysis or mitigation measures that were presented in the September 2017 Draft EIR. The Recirculated Final EIR was certified on November 14, 2017, and the Board of Directors made Findings and issued a Statement of Overriding Considerations.

4.0 MODIFIED PROJECT DESCRIPTION

Rule 11-18 required facilities whose health risk was determined to exceed a specific action level to either reduce the facility risk below the action level or to install TBARCT on all significant sources of risk. This could include operational changes, increases in stack height for better dispersion, installation of air pollution control equipment, etc.

Air District staff is proposing amendments to Rule 11-18 that would expedite the HRA approval steps, as well as other changes that would improve implementation efficiency of this rule. These proposed amendments focus on measures aimed at accelerating risk reduction and improving program efficiency to implement the requirements of the rule as soon as feasible.

The proposed amendments to Rule 11-18 include the following:

- Health Risk Assessments (HRAs)
    - Require facilities to prepare preliminary HRAs using Air District-approved modeling protocols. The protocols would apply standardized methods customized with site-specific information.
    - Provide updated HRA procedures, including site-specific modeling requirements. A site-specific modeling protocol is required to be submitted to the Air District for review and approval.
    - Give the Air District authority to review, correct, and approve HRA inputs and results;
    - Provide a provision where the Air District can prepare the HRA, when it is more expedient to do so or when the facility owner/operator lacks resources to conduct an HRA.
    - Establish specific deadlines for facilities to respond to Air District comments and corrections;
    - Formalize the current practice of holding a public comment period on the preliminary HRA concurrent with the existing 90-day comment period for the facility; and
    - Outline what happens when additional testing or emissions data may affect the facility's HRA results and RAL status.
- Risk Reduction Plans (RRPs)
    - Revise the terminology and timeline associated with the Air District's review of draft RRPs; and
    - Clarify the circumstances under which extensions to the implementation of an RRP or risk reduction measure may be granted.

Rule 11-18 applies to all facilities whose emissions of TACs may result in a significant risk to nearby receptors. This includes a broad range of commercial, industrial, and municipal facilities such as data centers, refineries, chemical plants, wastewater treatment facilities, foundries, forges, landfill operations, hospitals, crematoria, power plants, colleges and universities, and military installations.

To comply with the risk action levels for those affected facilities that are required to prepare a risk reduction plan, operators could reduce operations or install TBARCT equipment. Risk reduction measures may include the use of emission capture and control technologies that are intended to capture and remove a TAC or to convert a TAC into a less toxic material, alternative system designs, alternative products, or technologies that reduce or prevent the emission of the TAC or other measures that reduce the amount of TACs to which nearby receptors are exposed. See Chapter 2 of the EIR for a detailed discussion of the potential technologies that were evaluated in the EIR (Air District, 2017b).

5.0 PROJECT LOCATION

The proposed amendments to Rule 11-18 are being implemented to reduce toxic air contaminant emissions within the Air District's jurisdiction. The equipment affected by the proposed rule amendments is located within the jurisdiction of the Air District (see Figure 1). The Air District's jurisdiction includes all of Alameda, Contra Costa, Marin, San Francisco, San Mateo, Santa Clara, and Napa Counties and portions of southwestern Solano and southern Sonoma counties (approximately 5,600 square miles).

The San Francisco 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 result in increased potential for the accumulation of air pollutants in the inland valleys and reduced potential for buildup of air pollutants along the coast. The basin is bounded by the Pacific Ocean to the west and includes complex terrain consisting of coastal mountain ranges, inland valleys, and bays.

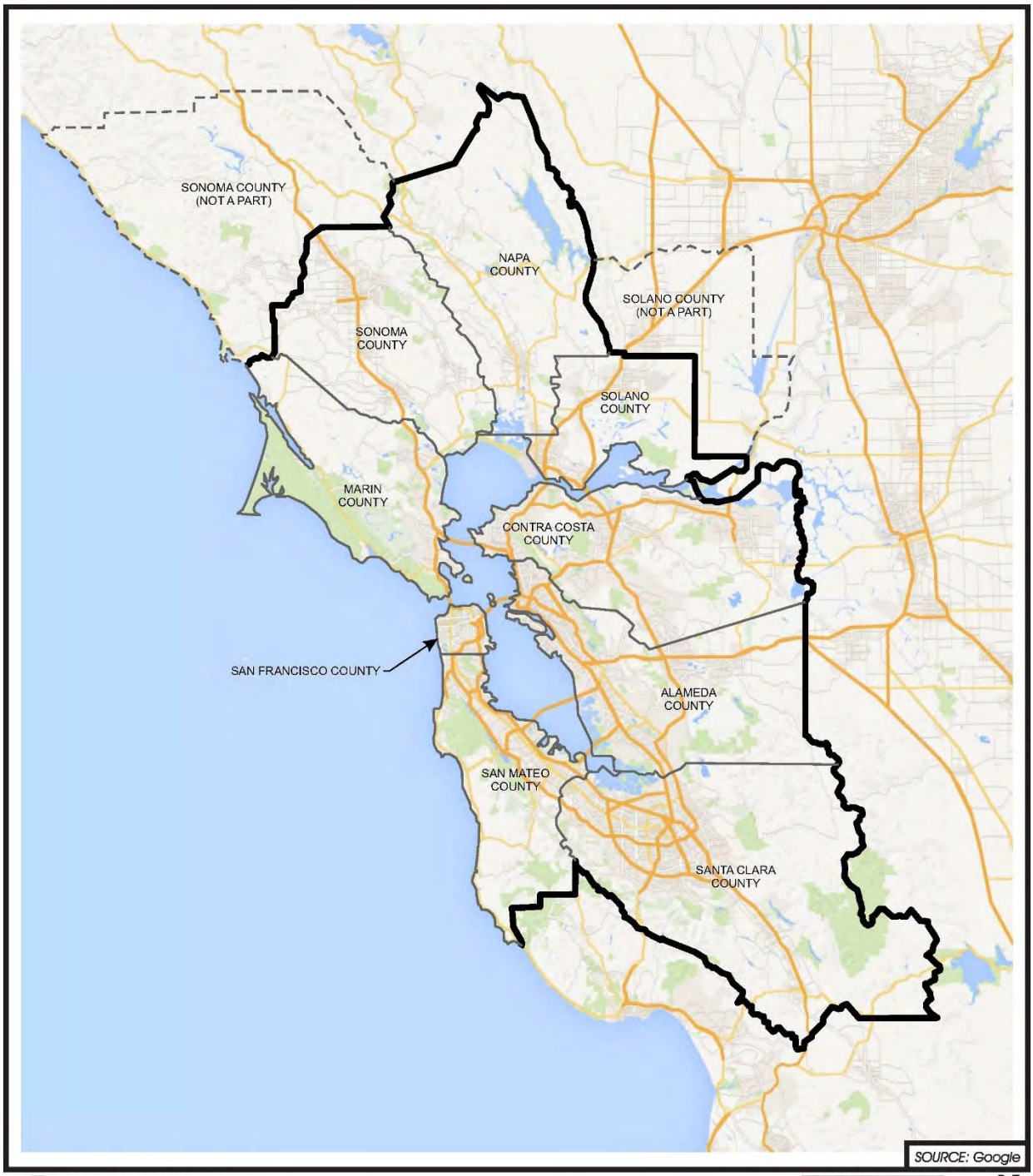

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Figure 1

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6.0 IMPACT ANALYSIS

The following sections present a summary of the impact analyses contained in the EIR for Rule 11-18 plus the analysis of the impacts of the proposed amendments to Rule 11-18. As required by CEQA Guidelines Section 15125, the EIR included a description of the physical environmental conditions, also referred to as the existing setting or baseline, within the Bay Area as they existed at the time the environmental analysis commenced. Specifically, the baseline was identified in the EIR as 2015, the last full year prior to the release of the NOP/IS.

This Addendum includes an evaluation of the same 19 environmental topic areas evaluated in the November 2017 EIR. The four environmental topic areas fully evaluated in the EIR for which there were less than significant impacts only after mitigation or significant impacts are evaluated in Subsections 6.1 through 6.4. The remaining environmental topic areas that were determined to have no significant or less than significant impacts in the EIR are examined in Section 7.0 of this Addendum. The below analyses support the Air District's conclusion that the proposed amendments to Rule 11-18 are not expected to trigger any conditions identified in CEQA Guidelines Section 15162 that would require the preparation of a subsequent EIR. Thus, a subsequent EIR or a supplement to the EIR as reflected in Guidelines Sections 15162 and 15163, respectively, are not appropriate.

Because this Addendum is associated with modifications to Rule 11-18, the Addendum focuses primarily on whether the modifications to Rule 11-18 constitute changes to the project warranting additional environmental review. The Air District is also not aware of any other changes to the project, changes in circumstances, or new information that would warrant additional environmental review under CEQA Guidelines Section 15162. Most obviously, the Air District is not aware of any changes to the abatement equipment that the Air District would expect to be installed, or to the facilities where that equipment would be installed, that would be sufficiently significant to potentially meet any of the triggers in CEQA Guidelines Section 15162(a)(3)(A)-(D).

6.1 Air Quality

Where 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:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
a) Conflict with or obstruct implementation of the applicable air quality plan?	No Impact	No	No	No	None
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	Significant Impact	No	No	No	None
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)?	Less than Significant (Potentially Significant Impact in NOP/IS)	No	No	No	None
d) Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant (Potentially Significant Impact in NOP/IS)	No	No	No	None
e) Create objectionable odors affecting a substantial number of people?	No Impact	No	No	No	None

6.1.1 Construction Emissions

Summary of November 2017 EIR for Rule 11-18

The EIR determined that there were a wide variety of TAC emissions with different physical or chemical characteristics, so that different types of control technologies may need to be installed at affected facilities to reduce risk levels to those required by Rule 11-18. Therefore, to comply with

Rule 11-18, air pollution control equipment may need to be installed, which would generate air emissions during the construction phase.

Based on assumptions of the number and types of air pollution control equipment that would be installed, it was determined that construction emissions associated with implementing Rule 11-18 could generate emissions that exceed the Air District's construction emission thresholds. Therefore, as shown in Table 1, construction air quality impacts were concluded to be significant for ROG, NOx, PM_{10} and $PM_{2.5}$ emissions in the EIR.

TABLE 1

Worst-Case Construction Emissions Under Rule 11-18

ACTIVITY	ROG	CO	NOx	SOx	PM_{10}	$PM_{2.5}$
Construction Emissions Per Unit Under Rule 11-18 (lbs/day)						
Diesel ICE Replacements 1 ICEs	0.88	4.73	4.77	<0.01	1.02	1.00
Diesel ICE Retrofits 1 ICEs	0.27	1.32	2.36	<0.01	0.08	0.06
1 Non-Refinery WGS, Baghouse, or ESP	2.96	15.23	17.99	0.10	2.69	2.44
1 Carbon Adsorption Unit or Thermal Oxidizer	3.27	10.84	16.53	0.01	2.22	2.01
1 Enclosure	1.56	14.08	17.61	0.04	1.54	1.20
Refinery WGS	17	67	84	<1	39	23
Potential Overlapping Emissions	25.94	113.2	143.26	1.15	46.55	29.71
Significance Thresholds	54	None	54	None	82	54
Significant?	No	--	**Yes**	--	No	No
Potential Overlapping Construction Emissions Under Rule 11-18 (lbs/day)						
10 Diesel ICE Replacements	8.8	47.3	47.7	0.1	10.02	10.0
10 Diesel ICE Retrofits	2.74	13.2	23.2	0.01	0.80	0.58
10 Non-Refinery WGS, Baghouse, or ESP	29.6	152.3	179.9	1.0	26.9	24.4
5 Carbon Adsorption Unit or Thermal Oxidizer	16.35	54.25	82.65	0.05	11.1	10.05
3 Enclosures	4.68	42.23	52.82	0.13	4.62	3.60
3 Refinery WGSs	51	201	252	1	117	69
Total Potential Overlapping Emissions (lbs/day)	113.71	510.28	638.27	2.29	170.44	117.63
Significance Thresholds	**54**	None	**54**	None	**82**	**54**
Significant?	**Yes**	--	**Yes**	--	**Yes**	**Yes**
Potential Overlapping Construction Emissions Under Rule 11-18 (tons per year)						
10 Diesel ICE Replacements	0.004	0.024	0.024	0	0.005	0.005
10 Diesel ICE Retrofits	0.001	0.007	0.012	0	0.001	0.001
10 Non-Refinery WGS, Baghouse or ESP)	1.44	7.42	8.77	0.05	1.31	1.20
5 Carbon Adsorption Units or Thermal Oxidizers	0.8	2.64	4.03	0	0.54	0.49
3 Enclosures	0.56	5.05	6.31	0.01	0.55	0.43
3 Refinery WGS	6.3	25.2	31.2	<1	14.1	8.4
Total Potential Overlapping Emissions (tons/year)	2.81	15.14	19.15	0.06	2.41	2.13

ICE = internal combustion engine; WGS = wet gas scrubber; ESP = electrostatic precipitator
Source: Air District, 2017b

Based on the construction emissions in Table 1, the EIR concluded that construction air quality impacts associated with ROG, NOx, PM_{10} and $PM_{2.5}$ would be significant. Construction emissions, however, are temporary as construction emissions would cease following completion of construction activities. Mitigation measures were identified for the potentially significant

construction emissions impacts; nonetheless, it is likely that the construction emissions would remain significant following mitigation.

Impacts of the Modifications to Rule 11-18 (Proposed Project)

The modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the type of facilities that would be affected, air pollution control equipment that would be installed, or construction activities that would be required to comply with the modified rule. Therefore, the construction emissions estimated in the EIR would not be expected to change. The modifications to Rule 11-18 would not have any new or substantially more severe impacts related to construction than the approved Rule 11-18 and would not alter the conclusions of the EIR.

The modifications are anticipated to increase the pace of Rule 11-18 implementation, which one might think could theoretically result in more overlap of construction activities. However, the assumptions utilized to determine the potential for overlap in the EIR were highly conservative; for instance, the EIR relied on an assumption that all facility HRAs for high-priority facilities designated "Phase 1" would be complete within two years. The Air District's subsequent experience has demonstrated that this pace is infeasible and therefore the Air District is confident that the degree of potential overlap examined in the EIR remains conservative.

On February 7, 2024, the U.S. EPA revised the primary (health-based) annual $PM_{2.5}$ ambient air quality standard from 12 micrograms per cubic meter (ug/m^3) to 9 ug/m^3 to provide increased public health protection. Modeling completed by the Air District indicates that the Bay Area air basin is not in attainment of the revised annual $PM_{2.5}$ standard. Although the EIR identified an exceedance of the 24-hour $PM_{2.5}$ standard of 35 ug/m^3, it did not discuss an exceedance of the previous annual standard because the Bay Area air basin had attained that standard.

The existence of the new, lower annual $PM_{2.5}$ standard would not result in any new or substantially more severe air quality impacts. As noted, $PM_{2.5}$ emissions are not expected to increase compared to what was discussed in the EIR, and the EIR already discussed how those emissions may contribute to an exceedance of national ambient air quality standards. Further, the federal government has requested that the U.S. Court of Appeals for the D.C. Circuit strike down the revised annual standard, so it is unclear whether the Bay Area Air Basin will be formally designated nonattainment.

Last, the EIR indicated that the mitigation measures would be imposed through local land use permits for any future projects that require the installation of air pollution control equipment. After further evaluation, the Air District proposes to enforce the mitigation measures through conditions on air permits to simplify and ensure adequate monitoring and enforcement of the measures. This logistical change would not be expected to have any environmental impacts.

6.1.2 Operational Emissions

Summary of November 2017 EIR for Rule 11-18

The net effect of implementing Rule 11-18 was to reduce health risks by reducing TAC emissions from regulated sources. However, some control technologies have the potential to generate secondary or indirect air quality impacts as part of the control process. The air pollution control technologies that have the potential to generate secondary or indirect operational air quality impacts included:

- Diesel Particulate Filters – slight increase in nitrogen dioxide (NO_2) from regenerating filters;
- Carbon Adsorption – increase in combustion emissions from regenerating spent carbon;
- Thermal Oxidizer – potential increase in combustion emissions;
- Wet Gas Scrubber – slight increase in TAC emissions, minor indirect mobile source emissions increases.

As shown in Table 2, adopting Rule 11-18 was not expected to produce operational emissions that exceed either the Air District's daily or annual criteria pollutant significance thresholds. ROG, NOx, PM_{10} and $PM_{2.5}$ emissions would be less than the applicable significance thresholds and, therefore, were concluded to be less than significant.

TABLE 2

Worst-Case Operational Emissions Under Rule 11-18

ACTIVITY	ROG	CO	NOx	SOx	PM_{10}	$PM_{2.5}$
Peak Operational Emissions Per Facility Under Rule 11-18 (lbs/day)						
Regenerating Spent Carbon	0.02	0.08	0.29	<0.01	0.02	0.02
Thermal Oxidizer	0.16	7.10	0.88	0.01	0.17	0.17
Caustic/Catalyst for WGS Unit Truck Trips	0.06	0.26	1.84	0.02	0.04	0.02
Total Potential Overlapping Emissions	0.24	7.44	3.01	0.03	0.23	0.21
Significance Thresholds	54	None	54	None	82	54
Significant?	No	--	No	--	No	No
Peak Operational Emissions for Multiple Facilities Under Rule 11-18 (lbs/day)						
Regenerating Spent Carbon	0.77	0.40	1.43	0.01	0.08	0.08
Thermal Oxidizer	1.6	71.0	8.80	0.1	1.7	1.7
Caustic/Catalyst for WGS Unit Truck Trips	0.04	0.13	23.96	0.26	0.52	0.26
Total Potential Overlapping Emissions	2.41	71.23	34.19	0.37	2.3	2.04
Significance Thresholds	54	None	54	None	82	54
Significant?	No	--	No	--	No	No
Annual Operational Emissions for 1 Facility (tons per year)						
Regenerating Spent Carbon	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Thermal Oxidizer	0.03	1.30	0.16	0.00	0.03	0.03
Caustic/Catalyst for WGS Unit Truck Trips	0.003	0.01	0.10	0.00	<0.01	<0.01
Total Potential Overlapping Emissions	0.33	1.31	0.26	0	0.03	0.03
Worst-case Annual Operational Emissions for Multiple Facilities (tons per year)						
Regenerating Spent Carbon (5 Units)	0.14	0.07	0.26	<0.01	0.02	0.02
Thermal Oxidizers (10 Units)	0.29	12.96	1.61	0.02	0.31	0.31
Caustic/Catalyst for WGS Truck Trips (13 Units)	0.04	0.13	1.3	0.01	0.03	0.01
Total Potential Overlapping Emissions	0.47	13.16	3.17	0.04	0.37	0.34
Significance Thresholds tons/year	10	None	10	None	15	10
Significant?	No	--	No	--	No	No

It should be noted that in addition to the estimated emission increases associated with the operation of new air pollution control equipment under Rule 11-18, reduction in air emissions would also be expected. Some of those reductions would be large, for example, a wet gas scrubber (WGS), baghouse, or electrostatic precipitator (ESP) would be expected to result in PM_{10}/$PM_{2.5}$ and TAC emission reductions. However, it is not possible to estimate those emission reductions until the sources that will be controlled are known, the type of air pollution control device has been identified, appropriate engineering analyses have been completed and so forth. Nonetheless, the potential emission increases were expected to be either wholly or partially offset with emission decreases.

To comply with the risk or emission reduction requirements of Rule 11-18, WGS may be used. For example, caustic is used in the operation of a WGS. There are several types of caustic solutions that can be used in WGS operations, but NaOH (50 percent solution, by weight) is the one most commonly used. NaOH is a TAC that is a non-cancerous, but an acutely hazardous substance (i.e., an acute reference exposure level has been established by the California Office of Environmental Health Hazard Assessment). The analysis in the EIR determined that NaOH emissions are expected to be relatively low and would not be expected to impact sensitive receptors. Further, an alternative to using NaOH as the caustic solution is sodium carbonate (Na_2CO_3) which is commonly known as soda ash, a non-toxic, non-cancerous, and nonhazardous substance. This caustic does not have the potential to generate significant adverse TAC emission impacts. For these reasons, it is unlikely that NaOH emissions would create significant adverse acute hazard impacts to any nearby sensitive receptors.

It should be noted that in addition to the estimated TAC emission increases associated with the operation of new air pollution control equipment under Rule 11-18, a reduction in TAC emissions would also be expected. However, it is not possible to estimate those emission reductions until the sources that will be controlled are known, the type of air pollution control device has been identified, appropriate engineering analyses have been completed and so forth. Nonetheless, air pollution control equipment installed to control TAC emissions as a result of the proposed rule was expected to result in a reduction in TAC emissions from affected facilities.

Impacts of the Modifications to Rule 11-18 (Proposed Project)

The modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the type of facilities that would be affected, the type of air pollution control equipment that would be installed, or the potential air emissions associated with operation of any new equipment. Therefore, the operational criteria and TAC emissions are not expected to change from those estimated in the EIR.

Based on the above, the modifications to Rule 11-18 would not have any new or substantially more severe impacts related to criteria pollutants than the Approved Project and would not alter the conclusions of the EIR.

6.1.3 Cumulative Air Quality Impacts

Summary of November 2017 EIR for Rule 11-18

In the analysis of construction air quality impacts, it was concluded that air quality impacts from construction activities would be significant from implementing Rule 11-18 because the potential overlap in construction activities for moderately-sized pieces of air pollution control equipment would likely exceed the applicable significance thresholds for construction air quality impacts, even after implementing mitigation measures. Likewise, the ROG, NOx, PM_{10} and $PM_{2.5}$ air quality impacts due to construction are considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064 (h)(1) and therefore, generate significant adverse cumulative construction air quality impacts. It should be noted, however, that the air quality analysis is a conservative, "worst-case" analysis so the actual construction impacts are not expected to be as great as estimated in the EIR. Further, the construction activities are temporary and would be terminated once any future construction activities are completed.

Implementing Rule 11-18 was not expected to generate significant adverse project-specific air quality impacts due to operation. Air quality impacts from Rule 11-18 were also not considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1). As discussed above, in addition to the estimated emission increases associated with the operation of new air pollution control equipment under Rule 11-18, reductions in air emissions would also be expected, some of which are potentially large. However, it is not possible to estimate those emission reductions until the sources that will be controlled are known, the type of air pollution control device has been identified, appropriate engineering analyses have been completed and so forth. Nonetheless, the potential emission increases are expected to be either wholly or partially offset with emission decreases.

Impacts of the Modifications to Rule 11-18 (Proposed Project)

Because the modifications to Rule 11-18 are not expected to have any impact on emissions as compared to the impacts analyzed in the EIR, the modifications to Rule 11-18 definitionally cannot have any impact on cumulative air quality impacts.

6.1.4 Conclusions

As discussed above, the modifications to Rule 11-18 would not have any new or substantially more severe impacts related to air quality than the approved Rule 11-18 and would not alter the conclusions of the EIR.

6.2 Greenhouse Gas Emissions

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Significant Impact (Potentially Significant Impact)	No	No	No	None
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant Impact	No	No	No	None

6.2.1 Summary of November 2017 EIR for Rule 11-18

The EIR determined that the impacts on Greenhouse Gas (GHG) emissions would be significant, as shown in Table 3.

TABLE 3

Predicted Operational GHG Emissions Rule 11-18

Activity	CO_2e MT/Year
Total Amortized Construction Emissions	970
Total Operational Emissions for 5 Carbon Adsorption Units	7
Total Operational Emissions 10 Thermal Oxidizers	4,550
Total Haul Truck Emissions for 13 WGS Units	314
Total Electrical Emissions for 13 WGS Units and 5 ESPs	15,095
Total Potential Overlapping GHG Emissions	20,936
Significance Threshold	10,000 MT/yr
Significant?	**Yes**

See October 2021 Draft EIR, Table 3.3-18 for detailed information.

Evaluation of those air pollution control technologies that would most likely be used to reduce TAC emissions from affected facilities pursuant to Rule 11-18 indicates that Rule 11-18 could generate direct and indirect GHG emission impacts that exceed the Air District's operational GHG emissions significance threshold of 10,000 $MTCO_2e/yr$. Therefore, because the analysis of GHG emission impacts is by definition a cumulative impact analysis, cumulative operational GHG emission impacts for Rule 11-18 were concluded to be significant.

GHG emission increases at facilities that are covered under the California Air Resources Board's (CARB's) Cap and Trade program (e.g., refineries, power plants, manufacturing facilities, etc.) are required to offset GHG emissions on an annual basis. CARB's Cap and Trade program allows covered facilities to buy and sell GHG emissions credits to demonstrate compliance with the program requirements. Rule 11-18 was not expected to generate substantial GHG emissions at any one facility that would interfere with the facility's ability to comply with CARB's Cap and Trade requirements. Since there is no specific information as to where control equipment would be required, it would be speculative to assume that GHG emissions would be offset under Cap and Trade. However, GHG emission increases at facilities that are covered under CARB's Cap and Trade program (e.g., refineries, power plants, manufacturing facilities, etc.) would be required to offset under the Cap and Trade Program. Therefore, a portion of the GHG emission increases that may occur due to implementation of Rule 11-18 are expected to be offset. Since the GHG emissions reductions expected due to compliance with AB 32 and the Cap and Trade Program are speculative, cumulative GHG emission impacts are expected to remain significant for implementing Rule 11-18.

6.2.2 Impacts of the Modifications to Rule 11-18 (Proposed Project)

The modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the type of facilities that would be affected, air pollution control equipment that would be installed, construction activities that would be required to comply with the modified rule, or GHG emissions associated with the operation of new air pollution control equipment. Therefore, the proposed modifications to Rule 11-18 would not change the GHG impacts as evaluated in the EIR.

6.2.3 Conclusions

As discussed above, the impacts of the proposed rule modifications on greenhouse gas emissions are expected to remain significant. The proposed modifications to Rule 11-18 would not have any new or substantially more severe GHG emission impacts than the approved Rule 11-18 and would not alter the conclusions of the EIR. The impacts of Rule 11-18 would remain significant for GHG emissions.

6.3 Hazards and Hazardous Materials

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant Impact (following mitigation)	No	No	No	None
b) 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?	Less than Significant Impact	No	No	No	None
c) Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact	No	No	No	None
d) 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?	Less than Significant Impact	No	No	No	None
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area?	No Impact	No	No	No	None
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	No Impact	No	No	No	None

Would the Project?	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No Impact	No	No	No	None
h) 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?	Less than Significant Impact	No	No	No	None

6.3.1 Summary of November 2017 EIR for Rule 11-18

With the exception of baghouses and dry ESPs, the hazard impacts associated with the installation of air pollution control equipment under Rule 11-18 were expected to be less than significant without mitigation.

For baghouses and dry ESPs, there was the potential for fire or explosion impacts. Therefore, feasible mitigation measures pursuant to CEQA Guidelines Section 15126.4 were identified and are described in Chapter 3.4.5.1 and 3.4.5.2 of the EIR. The hazard impacts under implementation of Rule 11-18 were expected to be less than significant following mitigation.

Installation of most types of air pollution control equipment, if required in the future, is not expected to cause or contribute to significant adverse hazard impacts, with the exception of baghouses or dry ESPs. As a result, feasible mitigation measures pursuant to CEQA Guidelines Section 15126.4 were identified and were described. Implementing those mitigation measures was expected to reduce significant adverse hazards and hazardous materials impacts to less than the applicable hazards and hazardous materials significance thresholds. Therefore, overall hazards and hazardous materials impacts, including accidental releases of hazardous materials during transport, were concluded to be less than significant. Cumulative impacts related to hazards and hazardous materials were also not determined to be significant after mitigation.

6.3.2 Impacts of the Modifications to Rule 11-18 (Proposed Project)

The modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not

expected to change the type of facilities that would be affected, air pollution control equipment that would be installed, construction activities that would be required to comply with the modified rule, or hazard impacts emissions associated with the operation of new air pollution control equipment. Therefore, the proposed modifications to Rule 11-18 would not change the hazard impacts, including the cumulative impacts, as evaluated in the EIR.

6.3.3 Conclusions

As discussed above, the impacts of the proposed rule modification on hazard impacts are expected to remain less than significant following mitigation. The proposed modifications to Rule 11-18 would not have any new or substantially more severe hazard impacts than the approved rule and would not alter the conclusions of the EIR. The impacts of Rule 11-18 would remain less than significant after mitigation for hazard impacts.

6.4 Hydrology and Water Quality

Both Hydrology and Water Quality (discussed in Section 3.5 of the EIR) and Utilities and Service Systems (discussed in Section 3.6.3.13 of the EIR) deal with water demand and water quality impacts. The EIR discussed water demand and water quality impacts in the Hydrology and Water Quality section. This Addendum follows the same approach. Please note that although the checklist in Section 7.14 below, for Utilities and Service Systems, identifies a significant impact related to water demand, this Addendum discusses that impact primarily in this section.

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
a) Violate any water quality standards or waste discharge requirements?	Less than Significant Impact	No	No	No	None
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	Significant Impact	No	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation onsite or offsite?	No Impact	No	No	No	None
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?	No Impact	No	No	No	None

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
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?	No Impact	No	No	No	None
f) Otherwise substantially degrade water quality?	Less than Significant Impact	No	No	No	None
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?	No Impact	No	No	No	None
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	No Impact	No	No	No	None
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?	No Impact	No	No	No	None
j) Inundation by seiche, tsunami, or mudflow?	No Impact	No	No	No	None

6.4.1 Summary of November 2017 EIR for Rule 11-18

The EIR determined that certain types of air pollution control equipment will require water including water for dust suppression during construction activities, as well as the operation of wet electrostatic precipitators, and wet gas scrubbers. Water demand impacts from installing most types of air pollution control equipment that use water as part of the control process would not create water demand impacts that exceed the applicable water demand significance thresholds. However, it is likely that water demand impacts from installing wet gas scrubbers, especially on large refinery equipment, could exceed applicable water demand significance thresholds and, therefore, water demand impacts were concluded to be significant.

Water quality impacts from installing most types of air pollution control equipment that use water as part of the control process would not be expected to exceed applicable water quality significance thresholds and, therefore, were concluded to be less than significant. Wastewater from certain types of air pollution equipment (e.g., wet gas scrubbers and wet electrostatic precipitators) can be treated and then recirculated back to the equipment to be used again. Depending on a facility's wastewater treatment system, the rest of the effluent may be further treated and discharged to the sanitary sewer system. Wet gas scrubbers are most likely to be used on large emission sources such as refinery units, gas turbines or other large industrial facilities that currently have wastewater discharges and wastewater treatment systems. Depending on the type of equipment, some water may be lost as steam. For these reasons, it is not expected that wastewater from air pollution control equipment would exceed a facility's current wastewater discharge limits, require changes to existing wastewater permit conditions, or require new wastewater permits. Refineries and other large manufacturing facilities are large users of water, have large wastewater discharges, have large wastewater treatment facilities, and operate under the requirements of industrial waste discharge permits. Regardless of the facility, wastewater discharges from an industrial facility would be required to be discharged in compliance with applicable wastewater discharge permits. Therefore, water quality impacts are not expected to exceed any applicable water quality significance thresholds, so water quality impacts during operation are concluded to be less than significant.

Mitigation measures for water demand were imposed. However, because of the prevalence of drought conditions in Northern California, in spite of implementing the mitigation measures identified, water demand impacts associated with implementing Rule 11-18 were expected to remain significant, in part because there was no guarantee that reclaimed water will be available to all of the affected facilities.

With regard to water quality, it was concluded that impacts would be less than significant, so no mitigation measures were required.

The EIR determined that water demand and water quality during construction activities would be less than significant. Similarly, it was concluded that water quality impacts from the proposed project during operation would be less than significant. Construction water quality, construction water demand impacts and operational water quality impacts were also not considered to be cumulatively considerable (CEQA Guidelines Section 15064 (h)(1)) and, therefore, were not expected to generate significant adverse cumulative impacts for these environmental topic areas.

The EIR concluded that water demand impacts from the proposed project during operation have the potential to generate significant adverse operational water demand impacts associated with installing a WGS. Therefore, operational water demand impacts during operation of the proposed project are considered to be cumulatively considerable for implementation of Rule 11-18 (CEQA Guidelines Section 15064 (h)(1)).

6.4.2 Impacts of the Modifications to Rule 11-18 (Proposed Project)

The modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not

expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, construction activities that would be required to comply with the modified rule, or water demand or water quality associated with the operation of new air pollution control equipment. Therefore, the water demand impacts associated with the proposed amendments to Rule 11-18 are expected to be the same as those estimated in the EIR, including cumulative impacts, and would not change the hydrology/water quality impacts as evaluated in the EIR.

6.4.3 Conclusions

As discussed above, the modifications to Rule 11-18 will have no additional impacts on hydrology and water quality than the Approved Project evaluated in the EIR.

The proposed modifications to Rule 11-18 would not have any new or substantially more severe hydrology or water quality impacts than the approved rule and would not alter the conclusions of the EIR. The impacts of the implementation of Rule 11-18 on hydrology and water quality would remain significant due to the potential water demand impacts associated with the potential operation of large WGSs at industrial (e.g., refinery) facilities.

7.0 POTENTIAL ENVIRONMENTAL IMPACTS FOUND TO BE NOT SIGNIFICANT

This section discusses the remaining 14 environmental topic areas found not to be significantly affected by implementation of the Rule 11-18 October 2016 NOP/IS and the November 2017 EIR, and as a result of the currently proposed modifications to Rule 11-18. The EIR found that the following topics would have less than significant or no impacts. The proposed amendments to Rule 11-18 would have similar or reduced impacts as compared to the currently approved Rule 11-18 for these resources, as discussed below. These environmental topic areas were found not to be significant in the October 2016 NOP and the EIR. The effect of the proposed Rule 11-18 modifications on the conclusions relating to each of these environmental topic areas is discussed in the following sections. The currently proposed modifications to Rule 11-18 are not expected to create new significant impacts or worsen the potential less than significant impacts for the environmental topic areas discussed in this section.

7.1 Aesthetics

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
a) Have a substantial adverse effect on a scenic vista?	No Impact	No	No	No	None
b) Substantially damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?	No Impact	No	No	No	None
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	Less than Significant Impact	No	No	No	None
d) Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	Less than Significant Impact	No	No	No	None

Rule 11-18 required facilities whose health risk is determined to exceed a specific action level to either reduce the facility risk below the action level or to install TBARCT on all significant sources of risk. Some control options include stack modifications. Stack modifications are another common and generally inexpensive risk reduction measure that are often used to reduce risk by increasing the stack height, for example, providing better dispersion of emissions. Rule 11-18 could also result in the installation of new air pollution control equipment to mitigate TAC emissions. While these control devices may be visible to surrounding areas, they would be installed within existing industrial or commercial areas, would be subject to local height limits, and were not expected to block any scenic vista, degrade visual character or quality or an area, or result in significant adverse aesthetic impacts.

The facilities affected by Rule 11-18, including petroleum refineries, may need to install or modify air pollution control equipment or modify operations to implement risk reduction measures. However, it is unlikely that any of the changes would result in additional night-time operation that would require extra lighting. New light sources, if any, were not expected to be noticeable in residential areas. Most local land use agencies have ordinances that limit the intensity of lighting and its effects on adjacent property owners. Therefore, implementation of Rule 11-18 was not expected to have significant adverse aesthetic impacts to the surrounding community.

The proposed modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the aesthetic impacts as evaluated in the EIR.

7.2 Agricultural and Forestry 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 as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
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?	No Impact	No	No	No	None
b) Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?	No Impact	No	No	No	None
c) Conflict with existing zoning for, or cause rezoning of, forest land as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	No Impact	No	No	No	None
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No	No	No	None

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No	No	No	None

As discussed in the EIR, the facilities that would be affected by Rule 11-18 are located primarily in industrial and commercial areas where agricultural or forest resources are generally not located. Some construction activity is expected to result from compliance with Rule 11-18; but such activities were expected to occur on the premises of the affected facilities and, therefore, would not impact agricultural and forestry resources.

The modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the agricultural and forestry resource impacts as evaluated in the EIR.

7.3 Biological Resources

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
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 Wildlife or U.S. Fish and Wildlife Service?	No Impact	No	No	No	None
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 Wildlife or U.S. Fish and Wildlife Service?	No Impact	No	No	No	None
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, marsh, vernal pool, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	No	No	No	None
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?	No Impact	No	No	No	None

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
e) Conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	No	No	No	None
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?	No Impact	No	No	No	None

As discussed in the EIR, the facilities affected by Rule 11-18 are expected to be located in the commercial and industrial areas within the Bay Area. These commercial/industrial areas have been graded to develop the various structures, and are typically surrounded by other commercial and industrial facilities. Native vegetation, other than landscape vegetation, has usually been removed from these facilities.

Similarly, modifications at existing facilities would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with native or resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Further, since the Rule 11-18 would primarily regulate stationary emission sources at commercial or industrial facilities, it would not directly or indirectly affect riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or identified by the California Fish and Wildlife or U.S. Fish and Wildlife Service. Improved air quality resulting from Rule 11-18 would be expected to provide health benefits to plant and animal species in the Bay Area. Therefore, implementation of Rule 11-18 was not expected to have significant adverse biological resource impacts.

The modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the impacts on biological resources as evaluated in the EIR.

7.4 Cultural Resources

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	No Impact	No	No	No	None
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	No Impact	No	No	No	None
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No Impact	No	No	No	None
d) Disturb any human remains, including those interred outside of formal cemeteries?	No Impact	No	No	No	None

As discussed in the EIR, implementing Rule 11-18 was primarily expected to result in controlling stationary source emissions at commercial or industrial facilities. Affected facilities are typically located in appropriately zoned commercial or industrial areas that have previously been graded and developed. Because controlling stationary source emissions from existing facilities does not typically require extensive cut-and-fill activities, or excavation, it is unlikely that additional stationary source control measures that may result from Rule 11-18 will: (1) adversely affect historical or archaeological resources as defined in CEQA Guidelines Section15064.5; (2) destroy unique paleontological resources or unique geologic features; or (3) disturb human remains interred outside formal cemeteries.

In a small number of cases, Rule 11-18 may require minor site preparation and grading at an affected facility to install new or modify existing equipment. Under this circumstance, it is possible that archaeological or paleontological resources could be uncovered. Even if this circumstance were to occur, significant adverse cultural resource impacts are not anticipated because there are existing laws in place that are designed to protect and mitigate potential adverse impacts to cultural resources. As with any construction activity, should archaeological resources be found during construction that results from implementing the rule, the activity would cease until a thorough archaeological assessment is conducted. Therefore, no significant adverse impacts to cultural resources were expected due to implementation of Rule 11-18.

The modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the impacts on cultural resources as evaluated in the EIR.

7.5 Geology and Soils

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	No substantial change to prior analysis
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) 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.	No Impact	No	No	No	None
ii) Strong seismic ground shaking?	Less than Significant Impact	No	No	No	None
iii) Seismic-related ground failure, including liquefaction?	Less than Significant Impact	No	No	No	None
iv) Landslides?	Less than Significant Impact	No	No	No	None
b) Result in substantial soil erosion or the loss of topsoil?	No Impact	No	No	No	None
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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than Significant Impact	No	No	No	None

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	No substantial change to prior analysis
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?	No Impact	No	No	No	None
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?	No Impact	No	No	No	None

As discussed in the EIR, some new structures, or structural modifications at existing affected facilities may occur as a result of installing control equipment or making process modifications to comply with Rule 11-18. However, the rule will not directly expose people or structures to earthquake faults, seismic shaking, seismic-related ground failure including liquefaction, landslides, mudslides or substantial soil erosion. Existing affected facilities or modifications to existing facilities would be required to comply with relevant California Building Code requirements in effect at the time of initial construction or modification of a structure.

The California Building Code is considered to be a standard safeguard against major structural failures and loss of life. The goal of the Code is to provide structures that will: (1) resist minor earthquakes without damage; (2) resist moderate earthquakes without structural damage but with some non-structural damage; and (3) resist major earthquakes without collapse but with some structural and non-structural damage. Therefore, compliance with the California Building Code requirements is expected to minimize the potential impacts associated with earthquakes as well as liquefaction. The issuance of building permits from the local cities or counties will assure compliance with the California Building Code requirements. Therefore, no significant impacts from earthquakes, groundshaking, liquefaction, collapse or expansive soils were expected.

Although Rule 11-18 may require modifications at existing industrial or commercial facilities, such modifications are not expected to require substantial grading or construction activities. Any new air pollution control equipment is not expected to substantially increase the area subject to compaction since the subject areas would be limited in size and, typically, have already been graded or displaced in some way. Therefore, significant adverse soil erosion impacts were not anticipated from implementing Rule 11-18.

Rule 11-18 would only affect existing industrial or commercial facilities, which already are hooked up to appropriate sewerage facilities, and therefore no impacts on septic tanks or alternative wastewater disposal systems were expected.

The modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the impacts on geology and soils as evaluated in the EIR.

7.6 Land Use and Planning

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
a) Physically divide an established community?	No Impact	No	No	No	None
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?	No Impact	No	No	No	None
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	No Impact	No	No	No	None

As discussed in the EIR, Rule 11-18 was designed to reduce risk from existing stationary sources located throughout the Bay Area. Potential risk reduction measures include measures that would limit emissions of TACs. The rule does not include any components that would require major modifications to existing commercial or industrial facilities and, therefore, the rule would not result in impacts that would physically divide an established community or generate additional development.

Rule 11-18 was not expected to require any new substantial construction or development. New or modified pollution control equipment or enclosures may be required and would be located within existing commercial or industrial facilities. Construction activities would be limited to the confines of existing facilities which are zoned for commercial or industrial land use. Modifications to equipment would be limited to the confines of existing facilities and are not expected to affect adjacent land uses, divide an established community, conflict with any applicable land use plan or policy or conflict with any habitat conservation plan. Therefore, no impacts on land use and planning were expected.

The currently proposed modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that

would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the land use and planning impacts as evaluated in the EIR.

7.7 Mineral Resources

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
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?	No Impact	No	No	No	None
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?	No Impact	No	No	No	None

As discussed in the EIR, Rule 11-18 was designed to reduce risk from existing stationary sources located throughout the Bay Area. Potential risk reduction measures include measures that would limit emissions of TACs. The rule is not associated with any action that would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, or of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impacts on mineral resources were expected.

The modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the mineral resources impacts as evaluated in the EIR.

7.8 Noise

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
a) Exposure of persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant Impact	No	No	No	None
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant Impact	No	No	No	None
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Less than Significant Impact	No	No	No	None
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Less than Significant Impact	No	No	No	None
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	None
f) For a project within the vicinity of a private airstrip would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	None

As discussed in the EIR, Rule 11-18 was designed to reduce risk from existing stationary sources located throughout the Bay Area. Potential risk reduction measures include measures that would limit emissions of TACs. New modifications are expected to be limited to the commercial and industrial facilities. The existing noise environment at each of the affected facilities is typically dominated by noise from existing equipment onsite, vehicular traffic around the facilities, and trucks entering and exiting facility premises. No new major industrial equipment was expected to

be required to be installed due to the implementation of Rule 11-18, so that no noise impacts associated with the operation of the rule are expected. Air pollution control equipment is not generally a major noise source. Further, all noise producing equipment must comply with local noise ordinances and applicable OSHA and Cal/OSHA noise requirements. Therefore, industrial operations affected by the Rule 11-18 were not expected to result in noise that would exceed levels established by local noise control laws or ordinances.

As discussed in the EIR, construction activities associated with Rule 11-18 may generate some noise associated with temporary construction equipment and construction-related traffic. Construction would likely require truck trips to deliver equipment, a construction crew of up to about 15 workers, and a few pieces of construction equipment (e.g., forklift, welders, backhoes, cranes, and generators). All construction activities would be temporary and are expected to occur within the confines of existing commercial or industrial facilities so that no significant increase in noise was expected.

As discussed in the EIR, Rule 11-18 was not expected to generate or expose people to excessive groundborne vibration or groundborne noise. No major construction equipment that would generate vibration (e.g., backhoes, graders, jackhammers, etc.) is expected to be required. Therefore, Rule 11-18 was not expected to generate excessive groundborne vibration or noise.

The currently proposed modifications to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the noise resources impacts as evaluated in the EIR.

7.9 Population and Housing

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
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)?	No Impact	No	No	No	None
b) Displace a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere?	No Impact	No	No	No	None
c) Displace a substantial number of people, necessitating the construction of replacement housing elsewhere?	No Impact	No	No	No	None

As discussed in the EIR, Rule 11-18 was not anticipated to generate any significant effects, either directly or indirectly, on the Bay Area's population or population distribution. The rule would affect commercial and industrial facilities. It is expected that the existing labor pool would accommodate the labor requirements for any new or modified equipment at the facilities. In addition, it is not expected that the affected facilities would need to hire additional personnel to implement the rule. In the event that new employees are hired, it is expected that the existing local labor pool in the Bay Area (comprised from a population of approximately seven million people) can accommodate any increase in demand for workers that might occur as a result of adopting the rule. As such, adopting Rule 11-18 was not expected to induce substantial population growth.

As discussed in the EIR, Rule 11-18 could result in the installation of air pollution control equipment operated in commercial and industrial settings. However, Rule 11-18 was not expected to result in the creation of any industry that would affect population growth, directly or indirectly induce the construction of single- or multiple-family units, or require the displacement of people or housing elsewhere in the Bay Area. Based upon these considerations, significant population and housing impacts were not expected from the implementation of the rule.

The currently proposed amendments to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the population and housing impacts as evaluated in the EIR.

7.10 Public Services

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
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?	No Impact	No	No	No	None
Police protection?	No Impact	No	No	No	None
Schools?	No Impact	No	No	No	None
Parks?	No Impact	No	No	No	None
Other public facilities?	No Impact	No	No	No	None

As discussed in the EIR, Rule 11-18 was designed to reduce toxic health risks from stationary sources in the Bay Area. Rule 11-18 could require minor construction activities and modifications at existing facilities. The modifications were not expected to require additional service from local fire or police departments above current levels.

As noted in the "Population and Housing" discussion above, implementation of Rule 11-18 was not expected to induce population growth because the local labor pool (e.g., workforce) is expected to be sufficient to accommodate any activities that may be necessary at affected facilities. Additionally, modifications to existing facilities were not expected to require an increase in employees. Therefore, there was no expected increase in local population and thus no impacts were expected to local schools or parks.

The rule would not result in the need for new or physically altered government facilities in order to maintain acceptable service ratios, response times, or other performance objectives. There was not an expected increase in population as a result of the adoption of the rule, therefore, no need for physically altered government facilities.

The currently proposed amendments to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the public services impacts as evaluated in the EIR.

7.11 Recreation

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No Impact	No	No	No	None
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	No Impact	No	No	No	None

As discussed under "Land Use" above, there were no provisions in Rule 11-18 that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments; no land use or planning requirements will be altered by Rule 11-18. Air pollution control equipment, if necessary, would be installed within the confines of existing facilities, including refineries, and would not impact existing recreational facilities.

As noted in the "Population and Housing" discussion above, Rule 11-18 was not expected to induce population growth because the local labor pool (e.g., workforce) was expected to be sufficient to accommodate any activities that may be necessary at affected facilities. Additionally, operation of new air pollution control equipment is not expected to require a substantial increase in employees. Therefore, there was no expected increase in local population and thus no impacts were expected to local recreational facilities.

The currently proposed amendments to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the recreation impacts as evaluated in the EIR.

7.13 Transportation/Traffic

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior Analysis?
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Less than Significant Impact	No	No	No	None
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	Less than Significant Impact	No	No	No	None
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?	No Impact	No	No	No	None
d) Substantially increase hazards because of a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	No Impact	No	No	No	None

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior Analysis?
e) Result in inadequate emergency access?	No Impact	No	No	No	None
f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	No Impact	No	No	No	None

As discussed in the EIR, Rule 11-18 was designed to reduce health risks from stationary sources in the Bay Area. Any new or modified pollution control equipment is expected to be located in commercial, industrial, or institutional facilities and may require construction activities. It was estimated that approximately 30 facilities per year were expected to meet reductions by implementing either a baghouse or an enclosure. The construction of enclosures is expected to require the most construction equipment and workers, e.g., up to 34 delivery and/or disposal trucks and up to about 45 construction worker trips on a peak construction day (during the building construction phase for enclosures). Given the size of the Bay Area, this amount of construction traffic would not be noticeable, particularly since construction activities would be expected at existing commercial, industrial and institutional land uses and would be temporary. Rule 11-18 was not expected to require modification to circulation for temporary construction activities. As a result, construction traffic from Rule 11-18 was not expected to have significant impacts on the performance of the circulation system or on standards established for congestion management.

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

As discussed in the EIR, for a "worst case" analysis, it was assumed that about 180 facilities per year would be required to install a control device to comply with the rule. These facilities at any given day would generate an additional one-two truck trips per day in the entire Air District for delivery and disposal. These potential truck trips were not expected to significantly adversely affect circulation patterns on local roadways near affected facilities. In addition, this volume of additional daily truck traffic is negligible over the entire area of the Air District. Finally, the number of waste disposal transport trips substantially overestimates the number of anticipated trips

because owners/operators at affected facilities may use other types of add-on control equipment or limit throughput rates or operating times which would have no impact on traffic. No increase in worker traffic was expected as the operation of air pollution control equipment of the type expected under the rule is not expected to require any additional employees. Therefore, operational traffic under the Rule 11-18 was expected to be less than significant.

Rule 11-18 was not expected to involve the delivery of materials via air, so no increase in air traffic was expected. The addition of new or modified air pollution control equipment is not expected to change air traffic patterns or result in a change in location that results in substantial safety risks.

Rule 11-18 was not expected to increase traffic hazards or create incompatible uses. The Rule does not involve construction of any roadways or other transportation design features, so no changes to current roadway designs that would increase traffic hazards were expected. Emergency access at the commercial and industrial facilities affected by Rule 11-18 was not expected to be impacted by the rule. Each affected facility is expected to continue to maintain their existing emergency access. The rule was not expected to increase vehicle trips or to alter the existing long-term circulation patterns. The rule was not expected to require a modification to circulation, thus, no long-term impacts on the traffic circulation system were expected to occur.

Rule 11-18 was not expected to affect the performance of mass transit or non-motorized travel to street, highways and freeways, pedestrian or bicycle paths. No conflicts with any congestion management programs, to include level of service and travel demand measures, or other standards established by county congestion management agencies for designated roads or highways, were expected. No changes were expected to parking capacity at or in the vicinity of affected facilities as the rule only pertains to equipment located within existing commercial and industrial facilities. Therefore, no significant adverse impacts resulting in changes to traffic patterns or levels of service at local intersections were expected.

The currently proposed amendments to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the transportation/traffic impacts as evaluated in the EIR.

7.14 Utilities/Service Systems

Both Hydrology and Water Quality (discussed in Section 3.5 of the EIR) and Utilities and Service Systems (discussed in Section 3.6.3.13 of the EIR) deal with water demand and water quality impacts. The EIR discussed water demand and water quality impacts in the Hydrology and Water Quality section. This Addendum follows the same approach. Please note that although the checklist in this section identifies a significant impact related to water demand, this Addendum discusses that impact primarily in Section 6.4, above.

Would the project:	Conclusion in EIR	New significant impact	Substantially more severe significant impact	Refusal to adopt new mitigation/ alternative that would substantially reduce significant impact	Substantial change to prior analysis?
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Less than Significant Impact	No	No	No	None
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?	Less than Significant Impact	No	No	No	None
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	No Impact	No	No	No	None
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or would new or expanded entitlements needed?	Significant Impact	No	No	No	None
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant Impact	No	No	No	None
f) Be served by a landfill with sufficient permitted capacity to	Less than Significant Impact	No	No	No	None

	accommodate the project's solid waste disposal needs?					
g)	Comply with federal, state, and local statutes and regulations related to solid waste?	Less than Significant Impact	No	No	No	None

As discussed in the EIR, Rule 11-18 was designed to reduce health risks from stationary sources in the Bay Area. The facilities affected by the rule already exist and already use water, generate wastewater, treat wastewater, and discharges wastewater under existing wastewater discharge permits. The potential water demand impacts associated with implementation of Rule 11-18 were addressed under Hydrology and Water Quality (see above Section 6.4 for a summary of the water demand impacts). Water demand impacts were considered potentially significant in the EIR as certain types of air pollution control equipment (e.g., wet gas scrubbers) can require the use of substantial amounts of water (see Section 6.4.1 above for a more detailed discussion).

Wastewater/water quality impacts are also discussed in Section 6.4 and concluded to be less than significant. While certain types of air pollution control equipment may use substantial amounts of water, because of the expense and size associated with this type of equipment, it is expected that their use would be limited to large manufacturing facilities, e.g., refineries. Further, wet gas scrubbers can use substantial amounts of water, they lose a lot of water through steam generation and loss. Further, large manufacturing facilities are expected to have their own wastewater treatment facilities so any increase in wastewater would be handled by their own wastewater treatment facilities and any impacts on public facilities would be limited and less than significant.

Implementation of Rule 11-18 may require new or modified pollution control equipment within the confines of existing facilities. These modifications would not alter the existing drainage system or require the construction of new storm water drainage facilities. Nor would the changes required by the rule create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Therefore, no significant adverse impacts on storm drainage facilities were expected.

Rule 11-18 would reduce health risk posed by existing commercial or industrial facilities. The primary method for reducing these health impacts would be to reduce emissions of TACs, including the use of control technology like baghouses and catalytic oxidizers. Baghouses and catalytic oxidizers will generate solid waste, but they are not expected to require annual replacement events. The baghouses and spent catalyst are only expected to generate a few tons of waste per change out. It is assumed that any hazardous material will be taken to the U.S. Ecology Beatty Nevada hazardous waste facility for treatment and disposal. U.S. Ecology, Inc. is currently receiving waste, and is in the process of extending the operational capacity for an additional 35 years (U.S. Ecology, 2015). Clean Harbors in Grassy Mountain, Utah is also available to receive hazardous waste and is expected to continue to receive waste for an additional 70 years (Clean Harbors, 2015). Therefore, the impacts of implementation of Rule 11-18 on hazardous waste landfills are less than significant. Rule 11-18 was not expected to generate any significant increase in solid waste. Therefore, no significant adverse impacts were expected to solid waste as a result of the rule.

The currently proposed amendments to Rule 11-18 are expected to involve procedural revisions and minor technical changes to improve implementation and program efficiency. The proposed modifications are not expected to change the number or type of facilities that would be affected, air pollution control equipment that would be installed, or alter the construction activities that would be required to comply with the modified rule. Therefore, the proposed amendments to Rule 11-18 would not change the utilities and service system impacts as evaluated in the EIR.

8.0 CHANGES TO THE CHECKLIST SINCE 2016

At the time the NOP/IS for the Rule 11-18 EIR was circulated for public review and comment, and at the time of the certification of the November 2017 EIR, the environmental checklist did not include tribal cultural resources or wildfires as specific environmental topics. However, the CEQA Guidelines have since been updated to include these specific topics.

Tribal cultural resources were previously generally included under Cultural Resources (see Section 7.4). As with other cultural resources, the facilities affected by Rule 11-18 are typically located in commercial or industrial areas that have previously been graded and developed. Because emission control devices for stationary sources do not typically require extensive cut-and-fill activities or excavation, it is unlikely that additional stationary source control measures that may be required by implementation of Rule 11-18 will adversely impact tribal cultural resources.

Wildland fires were previously addressed in Hazards and Hazardous Materials, in question h (see Section 6.3). As discussed in the October 2016 NOP/IS, no increase in hazards associated with wildfires was anticipated from implementing Rule 11-18. The existing facilities affected by the proposed rule already exist and operate within the confines of existing commercial or industrial areas. Native vegetation has been removed from the operating portions of the affected facilities to minimize fire hazards. Therefore, implementation of Rule 11-18 was not expected to increase the risk of hazards associated with wildland fires.

It should be noted that the checklist has also been revised for transportation to focus on vehicle miles travelled (VMT) as opposed to level of service or congestion impacts. VMT as per CEQA Guidelines Section 15064.3 refers to the amount and distance of automobile travel attributable to a project. The State Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA do not require that transportation or VMT analyses be calculated for trucks or construction activities associated with a project (OPR, 2018). Therefore, project-related trucks are not part of this assessment. Further, construction workers are temporary and traffic related to construction activities will cease following the completion of construction.

As discussed above, implementation of Rule 11-18 is not expected to require additional employees following the construction phase. As a result, implementation of Rule 11-18 is not anticipated to generate additional VMT associated with worker vehicles.

9.0 CONCLUSIONS

As explained in Sections 6.0 and 7.0 of this Addendum, the analysis of the currently proposed amendments to Rule 11-18 indicate that no new significant adverse impacts would be created for any environmental areas analyzed in the EIR, nor would the modifications make substantially more severe any existing significant adverse impacts. Further, none of the other triggers for additional environmental review in CEQA Guidelines Section 15162 are met. Based on the environmental analysis prepared for the currently proposed modifications to Rule 11-18, the Air District has quantitatively and qualitatively demonstrated that the currently proposed modifications to Rule 11-18 qualify for an Addendum to the previously certified EIR.

10.0 REFERENCES

Air District, 2022. Bay Area Air Quality Management District 2022 CEQA Guidelines, April 2022, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

Air District, 2016. NOP/IS for Regulation 11: Hazardous Pollutants, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities (Rule 11-18) and Regulation 12: Miscellaneous Standard of Performance, Rule 16: Petroleum Refining Facility-Wide Emissions Limits (Rule 12-16), October, 2016. Available at: aaqmd.gov/~/media/dotgov/files/rules/regulation-11-rule-18/documents/20161012_nop_is_1216_1118-pdf.pdf?rev=c3eb782653e6492998e6f6f0580c3ec2&sc_lang=en

Air District, 2017a. Draft EIR for Regulation 11-18: Toxic Risk Reduction Rule and Regulation 12-16: Petroleum Refining Emissions Limits and Risk Thresholds, March 2017. Available at: https://www.baaqmd.gov/~/media/dotgov/files/rules/regulation-11-rule-18/documents/20170325_deir_1118_1216-pdf.pdf?rev=8a3cf32356ff4fc7a4c320c6c5c361db&sc_lang=en

Air District, 2017b. Recirculated Draft EIR for Regulation 11-18: Reduction of Risk from Air Toxic Emissions at Existing Facilities. August 2017. Available at: https://www.baaqmd.gov/~/media/dotgov/files/rules/regulation-11-rule-18/documents/20170901_rdeir_1118-pdf.pdf?rev=baa99d88fb0344cb9b4acba35eeec4a5&sc_lang=en

Air District, 2017c. November 2017, Recirculated Final EIR, Regulation 11-18: Reduction of Risk from Air Toxic Emissions at Existing Facilities. November 2017. Available at: https://www.baaqmd.gov/~/media/dotgov/files/rules/regulation-11-rule-18/documents/20171115_rfeir_1118-pdf.pdf?rev=055e56fae4e0474dbbc1393e5252f22e&sc_lang=en

Office of Planning and Research, 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. Available at: https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf