Summary Sheet: Martin Marietta Modernization Project

This Summary Sheet provides an overview of the Martin Marietta Pier 92 Modernization Project (Project), related to Air District Permit Application no. 703078. It provides background on the Project and summarizes the key differences between the Air District's permit review and the environmental analysis conducted pursuant to the California Environmental Quality Act (CEQA). It also provides key findings from the Air District's Permit Evaluation and the CEQA environmental analysis (a Draft Environmental Impact Report (DEIR)). Finally, it explains how the public can comment on the Permit Evaluation and the DEIR. As provided below, comments on the Permit Evaluation should be directed to the Air District, and comments on the DEIR should be directed to the City and County of San Francisco (City).

The EIR must be completed in compliance with CEQA before the Air District can make a final determination on the permit application. However, this Summary Sheet was prepared by the Air District to aid members of the public in understanding the permitting process for this permit application, so it explains permit requirements before CEQA requirements and key permit evaluation findings before key CEQA findings

Background

Martin Marietta Materials, Inc. (Martin Marietta) operates an existing marine sand processing plant at Pier 92. The facility processes sand mined from the San Francisco Bay (marine sand). The marine sand is barged to Pier 92, where it is offloaded, washed with fresh water, and then loaded onto customers' trucks. Martin Marietta's primary customers are the adjacent concrete batch plants, which receive 65-75 percent of the marine sand offloaded at the facility. As a result, the marine sand travels a much shorter distance by truck than it otherwise would to supply the concrete batch plants. The facility has been operating since 1982 and has had numerous owners. Martin Marietta acquired the facility in October 2021.

The facility is currently unpermitted by the Air District. It operated pursuant to an exemption for years, but a previous owner lost the exemption.[1] A detailed site history is provided in Appendix A to the Permit Evaluation. Martin Marietta seeks a permit to process up to 800,000 tons per year (TPY) of marine sand. It also seeks to modernize the facility, which will minimize emissions. The modernization would include the following facility improvements: building a 3 wall warehouse to enclose product sand stockpiles; confining truck loading of finished product within the warehouse; covering specific conveyors and the process screen; paving all areas used by customer trucks and most of the area used by front-end loaders; and the wheel wash station will be supplemented with a truck bed water spray system to wet uncovered loads. For more details on the proposed upgrades, see the Project Description in the DEIR. If market conditions support the facility running at the 800,000 TPY maximum, emissions would increase overall. But with the proposed

[1] In 2017, the Air District discovered the material's moisture content was too low to qualify for an exemption.

improvements, the facility would emit lower emissions on a per-throughput-basis than the existing operations.

Air District Permitting Requirements vs. CEQA

This application is subject to two similar, but distinct types of regulatory review: the Air District's application review process and CEQA. As explained below, these processes serve different purposes, and therefore, their analyses focus on different things. For this Project, the City serves as the lead agency for CEQA.

Air District Application Review Process/Permitting Requirements

The Air District must ensure compliance with applicable Air District, state, and federal air quality laws and regulations prior to issuing a permit. It prepares a Permit Evaluation, which documents compliance with the applicable laws and regulations. Its review is generally limited to analyzing sources of emissions that the Air District has regulatory authority over. These include stationary sources, such as conveyor systems and hoppers, but exclude mobile sources, such as trucks or loaders. It determines things like whether the application triggers Best Available Control Technology (BACT), offsets, or a health risk assessment (HRA) pursuant to Air District regulations.

In addition, before issuing a discretionary permit, the Air District must confirm compliance with CEQA—in this case, as a responsible agency,[2] the Air District must independently determine that the EIR is adequate and consider it before reaching a final determination on Martin Marietta's Air District Permit Application.

CEQA Review Requirements

CEQA is a statute that requires decision makers to consider the environmental impacts of a project prior to approval. It also prohibits the approval of a project with significant environmental impacts if there are feasible alternatives or mitigation measures. CEQA's analysis is much broader than air quality—it requires analysis of a breadth of potential environmental impacts such as aesthetic, biological, water quality, and cultural impacts to name a few. It also requires consideration of the project as a whole, so its analyses cover impacts from all sources, including mobile sources that the Air District does not have authority over. Here the "whole of the project" also includes a new lease with the Port and improvements to the stormwater management system, in addition to the proposed throughput increase and facility upgrades. Because the Project includes a new lease with the Port, the City is the lead agency and prepared the DEIR.

[2] Under CEQA, a "responsible agency" is any public agency, other than the lead agency, that has discretionary approval power over the project.

Additional Distinctions You May Notice between the Permit Evaluation and DEIR

Baselines

Because the facility is currently unpermitted, the Permit Evaluation considered all sources to be new in accordance with Air District Regulations and, therefore, treated the Project as if there were no prior operations (i.e., no marine sand processing). Thus, the Permit Evaluation analyzes the full potential emissions from each source—i.e., going from 0 TPY to 800,000 TPY of marine sand.

However, CEQA allows existing operations to be included in the baseline, even if unpermitted.[3] Here the DEIR uses a baseline throughput of 349,078 TPY based on the facility's average activity over the most recent 5-year operating period.[4] Thus, the CEQA analyses compare the difference in emissions or impacts between the baseline throughput of 349,078 TPY and the requested throughput of 800,000 TPY.

HRA

An HRA for a permit evaluation only analyzes risk from sources that the Air District has regulatory authority over; it can also include related permit applications from the past 5 years to prevent circumvention by breaking a project into multiple permit applications. In contrast, an HRA for CEQA purposes analyzes all aspects of a project, including sources that the Air District does not have regulatory authority over, such as trucks and mobile equipment. Also, a CEQA HRA will analyze annual average $PM_{2.5}$ concentrations ($PM_{2.5}$ concentrations), while an HRA for a permit evaluation does not. The results of both HRAs are provided in the relevant Key Findings sections.

Key Permit Evaluation Findings

BACT

Per Regulation 2-2-301, BACT is required for any new or modified source that has the potential to emit (i.e., daily emissions) 10 lb/day or more of specific pollutants, including PM_{10} and $PM_{2.5}$.[5] As shown in Table 1, fugitive road dust[6] triggers BACT for PM_{10} since it has the potential to result in 12.16 lbs/day of PM_{10}. It does not trigger BACT for $PM_{2.5}$ because its potential to emit $PM_{2.5}$ is less than 10 lbs/day. Likewise, BACT is not triggered for the Marine Sand Processing Plant or the Three Sand Stockpiles.

Pursuant to Regulation 2-2-202, the Air District determined that the most stringent control for fugitive road dust is: (1) paving haul roads; (2) spraying the roads with water; (3) limiting vehicle speed limits to 5 miles per hour; and (4) installing a wheel washer.[7]

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[3] See *Fat v. Sacramento County* (2002) 97 Cal.App.4th 1272.

[4] See the DEIR's discussion of existing conditions in the Project Description (section 2.C and Table 2-1) and the Approach to Baseline Conditions (section 3.A.4.1).

[5] Pursuant to Regulation 2-2-210, BACT pollutants are: Precursor organic compounds (POC), non-precursor organic compounds (NPOC), oxides of nitrogen (NO_x), sulfur dioxide (SO_2), PM_{10}, $PM_{2.5}$, and carbon monoxide (CO).

[6] Since the fugitive road dust is caused by vehicle traffic, it is referred to as "Vehicle Traffic" in the Permit Evaluation.

[7] The facility already has an existing wheel wash station; pursuant to BACT, this feature will be mandatory.

Table 1. BACT Determination

Source Description	Potential to Emit (lbs/day)		BACT Trigger Threshold (lbs/day)	BACT Triggered?
	PM_{10}	$PM_{2.5}$		
Marine Sand Processing Plant	9.50	1.97	10	No
Three Sand Stockpiles	0.25	0.07	10	No
Fugitive Road Dust from Vehicle Traffic[8]	**12.16**	5.61	10	**Yes, for PM_{10}**

Offsets

Facilities are required to offset emissions for certain pollutants if they exceed thresholds specified by Regulations 2-2-302 and 2-2-303.[9] As shown in Table 2, offsets are triggered for NO_x emissions; 12.696 TPY of NO_x credits will be provided by the Air District's Small Facility Banking Account.

Table 2. Offsets Determination Based on Cumulative Increase

Pollutant	Cumulative Increase (TPY)	Offsets Triggered Threshold (TPY)	Offsets Triggered?
Nitrogen Oxides (NO_x)	**12.696**	10	**Yes**
Precursor Organic Compounds (POC)	0.566	10	No
Particulates PM_{10}	1.640	100	No
Particulates $PM_{2.5}$	0.667	100	No
Sulfur Dioxide (SO_2)	1.272	100	No

HRA/Best Available Control Technology for Toxics (TBACT) & Project Risk Limits

The Air District's regulation of toxic air contaminants (TACs) is laid out in Regulation 2, Rule 5. Under this Regulation, an HRA is required for a new or modified source if TAC emissions exceed the trigger levels outlined in Regulation 2, Rule 5, Table 2-5-1. The annual emissions of arsenic and respirable crystalline silica exceed the applicable chronic trigger levels, so an HRA was prepared. The results of the HRA are then used to determine if the project requires implementation TBACT and if it complies with the Air District's health risk limits. As explained above, an HRA done for an Air District

[8] Based on the Air Districts regulatory authority, only onsite fugitive road dust emissions are included in the analysis.

[9] Pursuant to Regulation 2-2-302, offsets are required for POC and NOx if a facility will emit 10 tons per year or more of those pollutants. For PM_{10}, $PM_{2.5}$, and SO_2, offsets are required for facilities that will emit 100 tons per year or more of those pollutants pursuant to District Regulation 2-2-303.

permit evaluation is different than one done for CEQA purposes.[10] Table 3 summaries the TBACT trigger levels and project risk limits per Regulation 2, Rule 5. As shown in Table 4, the health risks are well below Air District's project risk limits. They are also below the TBACT trigger levels, meaning TBACT is not required. [11]

Table 3. TBACT Trigger Levels and Project Risk Limits

	Cancer Risk (in a million)	Chronic Hazard Index (HI)	Acute HI
TBACT Trigger Level[12] (applies to any new or modified *source*)	> 1	> 0.2	n/a
Project Risk Limit[13] (applies to the *project*)	10	1	1

Table 4. Air District Permit Evaluation HRA Results

	Project Cancer Risk (in a million)	Project Chronic HI	Project Acute HI
Permit Application	0.098	0.060	0.068
Regulation 2-5 limit	10	1	1
Limit Exceeded?	No	No	No

Key CEQA Findings

The CEQA review is focused on the changes to the facility and to its operations that will occur due to the Project. These include construction of a modernized facility and increasing operations over baseline levels.

[10] As mentioned, the Air Districts regulatory authority over TACs is limited to stationary sources, so this analysis cannot include emissions from mobile sources. Those are considered in the DEIR.

[11] As noted above, TBACT is triggered on a per source basis, meaning that the health risks from a source would have to exceed the TBACT trigger level before TBACT is required. Here, the health risks from *all* sources would be far below the TBACT triggers. And the risk from any individual source would be lower than the Project risk.

[12] See Regulation 2-5-301.

[13] See Regulation 2-5-302. Pursuant to Regulation 2-5-302, cancer risk is limited to 6 in a million for projects in overburdened communities as defined by Regulation 2-1-243. This Project is near, but not within, the boundaries of an overburdened community as defined by Regulation 2-1-243. While the lower 6 in a million limit does not apply to the Project, its cancer risk is far below either limit.

Construction and Operational Criteria Pollutant Emissions

Table 5 provides the construction-related criteria pollutant emissions that will occur due to the Project. As shown, emissions will be below the Air District's thresholds of significance, meaning impacts will be less than significant.

Table 5. Project Construction Emissions Compared to Air District's Thresholds of Significance

	Criteria Air Pollutants (pounds per day)			
	ROG	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Total Construction	0.3	4.6	0.5	0.3
Air District Daily Significance Threshold	54	54	82	54
Threshold Exceeded?	No	No	No	No

Table 6 provides the operational-related criteria pollutant emissions that will occur due to the Project. Under CEQA, the net change in emissions is compared to the threshold of significance to determine whether the project may cause a potentially significant impact. Thus, Table 6 adds up all the existing/baseline emissions ("Total Baseline (Existing) Emissions") and adds up all emissions that will occur due to the Project ("Total Project Operations Emissions"). Then the "Total Baseline (Existing) Emissions" are subtracted from the "Total Project Operations Emissions" to get the "Net Increase in Project Emissions." As shown, the net increase in emissions will not exceed the Air District's thresholds of significance, meaning impacts will be less than significant.

Table 6. Project Criteria Pollutant Emissions Compared to Air District's Thresholds of Significance

	Emissions (pounds per day)				Emissions (TPY)			
Emission Source	**ROG**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**	**ROG**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Total Baseline (Existing) Emissions	2.5	52.3	7.6	2.1	0.4	9.5	1.4	0.4
Total Project Operations Emissions	4.1	76.7	10.1	2.9	0.7	14.0	1.9	0.5
Net Increase in Project Emissions	1.6	24.3	2.5	0.8	0.3	4.4	0.5	0.2
Air District Daily and Annual Significance Threshold	54	54	82	54	10	10	15	10
Above Threshold?	No	No	No	No	No	No	No	No

Note: Totals may not add up perfectly due to rounding.

There will be a brief period during which construction will overlap with operations. However, during that time, it will not be physically possible for the site to operate at the full permit limit, even if market

forces would support that level of production. But even in a hypothetical situation in which maximum throughput was achieved during construction, there would not be any significant impacts.[14]

Health Risk Impacts

The HRA prepared for the DEIR evaluated excess lifetime cancer risk, $PM_{2.5}$ concentrations, and chronic and acute hazard indices at sensitive receptors who would be exposed to emissions from construction and operation of the Project. The City has CEQA Guidelines and thresholds of significance that specifically address excess cancer risk and $PM_{2.5}$ concentrations. This section addresses those impacts first, followed by discussion of chronic and acute hazard risks which are evaluated pursuant to the Air District's thresholds of significance.

Excess Cancer Risk, $PM_{2.5}$ Concentrations, and APEZ

The City created the air pollutant exposure zone (APEZ) to identify areas where air modeling indicates higher levels of air pollution based on health protective criteria that consider estimated cancer risk, exposures to fine particulate matter, proximity to freeways, and locations with particularly vulnerable populations.[15] Based on the Project's zip code, the criteria for identifying areas as being within an APEZ are (1) a cancer risk greater than 90 per 1 million persons exposed and/or (2) a cumulative $PM_{2.5}$ concentration greater than 9.0 $\mu g/m^3$. This is determined by including background sources of air pollution as determined in a 2020 Citywide HRA. San Francisco's health risk thresholds evaluate the potential for a proposed project to affect the geography and severity of the APEZ at sensitive receptor locations. More health protective CEQA thresholds of significance for cancer risk and $PM_{2.5}$ concentrations are applied to projects at sensitive receptor locations that already meet the APEZ criteria.

As shown in Table 7, under both the existing scenario and the existing-plus-project scenario, the maximum cancer risk would be less than 90 per 1 million for both the Maximally Exposed Individual Resident (MEIR) and Maximally Exposed Individual Worker (MEIW). Thus, Table 7 shows that the MEIR and MEIW would not meet the APEZ criteria, and the Project would not substantially affect the geography and severity of the APEZ at sensitive receptor locations. Because the APEZ criteria are not met, there is no impact related to excess cancer risk. See the analysis under Impact AQ 4 in the DEIR for more details.

[14] Of all the criteria pollutants evaluated, NOx emissions will increase the most due to the Project. Because these arise from mobile sources, such as barge, tugboats, and trucks, these would be the same regardless of whether the modernized facility replaces the current facility. Thus, at 800,000 tpy, NOx emission would increase 24.3 pounds per day over baseline. Adding the 4.6 pounds per day from construction would still be well below the 54 pounds per day threshold of significance.

[15] For more information on the APEZ, see San Francisco Planning, *Air Quality and Greenhouse Gas Analysis Guidelines*, (2025) and the DEIR, section 3.B.2.3 and Impact AQ-4.

Table 7. Excess Cancer Risk Per Million

	MEIR	MEIW
APEZ Criteria	90	90
Existing Lifetime Excess Cancer Risk	42.32	32.48
Existing-plus-project Lifetime Excess Cancer Risk	42.35	30.68
Net Change in Cancer Risk	0.02	-1.8
APEZ Criteria met?	No	No

Note: Totals may not add up perfectly due to rounding.

Similarly, Table 8 shows that under both the existing scenario and the existing-plus-project scenario, the $PM_{2.5}$ concentration would be less than 9.0 µg/m^3, for both the MEIR and MEIW. Thus, Table 8 shows that the MEIR and MEIW would not meet the APEZ criteria, and the Project would not substantially affect the geography and severity of the APEZ at sensitive receptor locations. Because the APEZ criteria are not met, there is no impact related to $PM_{2.5}$ concentration.

Table 8. Annual Average $PM_{2.5}$ Concentration (µg/m^3)

	MEIR	MEIW
APEZ Criteria	9.0 µg/m^3	9.0 µg/m^3
Existing $PM_{2.5}$ Concentration	8.37	7.91
Resulting $PM_{2.5}$ Concentration	8.37	7.95
Net Change in $PM_{2.5}$ Concentration	< 0.01	0.04
APEZ Criteria met?	No	No

Note: Totals may not add up perfectly due to rounding.

The DEIR also qualitatively analyzed whether the Project in combination with existing sources and reasonably foreseeable projects would result in a significant cumulative impact. The DEIR found that it is unlikely the cumulative conditions and projects would result in the APEZ criteria being met. Even if the APEZ criteria were met, the Project's minor contribution to cumulative cancer risk and $PM_{2.5}$ concentration would not be cumulatively considerable.

Chronic and Acute Hazard Risk

As shown in Tables 9 and 10, the Project will reduce impacts related to chronic and acute hazard risk. This reduction is due to the paving of onsite roads, which will reduce the TACs that make-up fugitive dust emitted from vehicle travel on unpaved surfaces.[16]

[16] Overall fugitive road dust emissions will increase because the increase in throughput at the permitted limit will result in increased *offsite* fugitive road dust. However, paving will reduce *onsite* fugitive road dust emissions, resulting in a corresponding decrease in TACs.

Table 9. Chronic and Acute Health Risk Impacts to MEIR

	Chronic Hazard Risk	Acute Hazard Risk
Total Baseline	0.002	0.001
Total Project	0.0018	< 0.001
Net Change	-0.0002	-0.0003
Significance Threshold	1.0	1.0
Exceeds Significance Threshold?	No	No

Note: Totals may not add up perfectly due to rounding.

Table 10. Chronic and Acute Health Risk Impacts to MEIW

	Chronic Hazard Risk	Acute Hazard Risk
Total Baseline	0.088	0.011
Total Project	0.071	0.007
Net Change	-0.016	-0.004
Significance Threshold	1.0	1.0
Exceeds Significance Threshold?	No	No

Note: Totals may not add up perfectly due to rounding.

Public Comment

Public Comment on the Engineering Evaluation is open from **June 5, 2026 through July 6, 2026** at 5pm. Comments may be sent to Flora Chan, Senior Air Quality Engineer, via email at martin_marietta_pier92@baaqmd.gov or you may leave a voice message at 415-749-8692.

Public Comment on the DEIR is open from **May 20, 2026 to July 6, 2026**. As noted, the City is the lead agency for the DEIR. Accordingly, please direct any comments on the DEIR to Jennifer McKellar; Senior Planner, at CPC.Pier92EIR@sfgov.org or (628) 652-7563. The San Francisco Planning Commission plans to hold a public hearing on this EIR on June 25, 2026 (beginning at 12 p.m. or later) to solicit public comment on the information presented in the DEIR. Additional information may be found on the planning department's website at https://sfplanning.org/hearings-cpc-grid. The DEIR, initial study, and all attachments are available for public review and comment on the planning department's Negative Declarations and EIRs web page (http://www.sf-planning.org/sfceqadocs). The City's Notice of Availability is available here.