

ENVIRONMENTAL CHECKLIST AND DISCUSSION

Human population within the jurisdiction of the AQMD is anticipated to grow regardless of implementing the proposed rule amendments. The proposed amendments are not expected to result in the creation of any industry that would effect population growth, or directly or indirectly induce the construction of single- or multiple-family units. No population relocation or growth inducement is expected from the rule's amendment.

I. LAND USE AND PLANNING. *Would the proposal:*

- | | Potentially Significant Impact | No Impact |
|--|--------------------------------|-------------------------------------|
| a) Conflict with general plan designation or zoning? | ☐ | ☒ |
| b) Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project? | ☐ | ☒ |
| c) Affect agricultural resources or operations (e.g. impacts to soils or farmlands, or impacts from incompatible land uses)? | ☐ | ☒ |
| d) Disrupt or divide the physical arrangements of an established community (including a low-income or minority community)? | ☐ | ☒ |

Present or planned land uses in the jurisdiction of the AQMD will not be affected as a result of the proposed rule. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by the proposed rule. The proposed rule amendments do not require the development, redesignation or rezoning of any properties.

II. POPULATION AND HOUSING. *Would the proposal:*

- | | Potentially Significant Impact | No Impact |
|--|--------------------------------|-------------------------------------|
| a) Cumulatively exceed official regional or local population projections? | ☐ | ☒ |
| b) Induce substantial growth in an area either directly or indirectly (e.g. through projects in an undeveloped area or extension of major infrastructure)? | ☐ | ☒ |
| c) Displace existing housing, especially affordable housing? | ☐ | ☒ |

III. GEOPHYSICAL. *Would the proposal result in or expose people to potential impacts involving:*

- | | Potentially Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|
| a) Seismicity: fault rupture, ground shaking, seiche or tsunami? | ☐ | ☒ |
| b) Landslides or mudslides? | ☐ | ☒ |
| c) Erosion, changes in topography or unstable soil conditions from excavation, grading or fill? | ☐ | ☒ |
| d) Subsidence of land? | ☐ | ☒ |

The rule amendments would not require the disruption or uncovering of soil, changes in topography or surface relief features, the erosion of beach sand, or a change in existing siltation rates. The amendments apply to existing facilities in the district such as refineries, oil production fields and chemical plants. The amendments pertain to existing and future wastewater systems at these facilities and will not expose people or property to geological hazards such as earthquakes, landslides, mudslides, ground failure, or other natural hazards because they do not directly or indirectly require facilities to modify any on-site or offsite geophysical formations.

IV. WATER. *Would the proposal result in:*

- | | Potentially Significant Impact | No Impact |
|--|--------------------------------|-------------------------------------|
| a) Changes in adsorption rates, drainage patterns, or the rate and amount of surface runoff? | ☐ | ☒ |
| b) Exposure of people or property to water related hazards such as flooding? | ☐ | ☒ |
| c) Discharge into surface waters or other alteration | ☐ | ☒ |

of surface water quality (e.g. temperature, dissolved oxygen or turbidity)?

- d) Changes in the amount of surface water in any water body? ☐ ☒
- e) Changes in currents, or the course or direction of water movements? ☐ ☒
- f) Change in the quantity of ground waters, either through direction additions or withdrawals, or through interception of an aquifer by cuts or excavations? ☐ ☒
- g) Altered direction or rate of flow of groundwater ☐ ☒
- h) Impacts to groundwater quality? ☒ ☐
- i) A need for new water treatment, distribution, sewer or storm water drainage systems? ☒ ☐

The proposed amendments have the potential to will expand the applicability of using carbon adsorption as a control measure to drains, junction boxes and manhole covers at affected facilities. The cleaning of carbon beds used in carbon adsorption systems has the potential to adversely impact water resources and quality. Water quality impacts as a result of using carbon adsorption to comply with the terms of the existing Rule 1176 were analyzed and found to be insignificant prior to mitigation in the 1989 Determination of No Significant Impacts for Rule 1176. The District continues to believe that facilities will not choose carbon adsorption to comply with the rule's provisions, as there are several, more cost-effective options available. The amount of carbon adsorption likely to be used to comply with the existing rule far exceeds the increased use which might occur as a result of the proposed amendments. Even when considered cumulatively, the potential water quality and demand impacts of Rule 1176 would be insignificant. This conclusion made in the 1989 Determination of No Significant Impacts Negative Declaration for Rule 1176 remains the same for the proposed amendments. Please refer to this document for a complete analysis of impacts from this control technology.

The County Sanitation Districts of Los Angeles County (LACSD) has estimated that 1.7 percent of the VOC emissions reduced (almost 3 tons per day) would be transferred to the wastewater discharge. Although this level of water quality impacts is not significant, LACSD has some reservation because this figure is calculated using the assumption that all affected facilities will continue to ventilate their drainage systems. If the affected facilities choose to completely seal the systems, a larger portion of the air emission reductions could be transferred to the wastewater discharge. LACSD will continue to monitor the water quality impacts after the amended rule is implemented to determine if there is any significant increase in VOC discharges associated with the proposed amendments to Rule 1176.

The AQMD does not believe that additional VOC transferred into the wastewater will result in a significant adverse water quality impact. The above estimate of 1.7 percent is based on the following conservative assumptions:

1. It is unlikely for the operators of the affected facilities to choose to completely seal their drainage systems because of issues involving safety, engineering complexity, and costs.
2. The estimate is based on physical and chemical data for benzene. AQMD's recent analyses of vapor samples taken from the drainage systems of several refineries showed that 93 percent of VOCs are straight-chain hydrocarbons which are less likely to be dissolved in water.

LACSD agrees with the AQMD that based on the best available estimate at this time, the potential adverse water quality impacts would be insignificant. To address the uncertainties in the assumptions used for the analysis, LACSD will continue to monitor water quality of the wastewater discharge. If, based on LACSD's long-term observation, it is determined that the water quality impacts as a result of the proposed amendments to Rule 1176 conflicts with Sanitation District's National Pollution Discharge Elimination Systems ("NPDES") permit conditions, AQMD will cooperate with and assist LACSD to examine all of the possible measures to mitigate the impacts. Some of these measures may include providing assistance to LACSD in meeting with the Regional Water Quality Control Board to resolve any potential matters related to their waste discharge limits, or reexamining the analysis conducted for this rule amendment.

Comments were received that suggest the possibility of adverse water quality impacts from the amendments if facilities choose to completely seal their drains to comply. According to calculations provided, approximately 1.7 percent of the VOCs reduced would under those circumstances be transferred to the wastewater discharge. The additional 3.06 tons of VOCs in the wastewater systems would then need to be treated by local sanitation district before discharge could occur.

The AQMD does not believe the this additional VOC transferred into the wastewater will result in a significant adverse impact. The analysis was a very conservative estimate which assumes that every facility will choose to completely seal its drain system components to comply with the rule. The rule does not mandate a specific control option, but rather, requires a fugitive VOC limit of 500 ppm. Therefore, it is feasible to assume that emissions being transferred to local sanitation districts will be even lower than the 1.7 percent projection. Even with this conservative assumption, 1.7 percent of the total VOC emission reductions obtained by the amendments would equal approximately 104 pounds per day being transferred into the waste stream. In addition, these emissions would not cause any facility subject to the rule to violate its Discharge Elimination Limits imposed by local sanitation districts.

V. AIR QUALITY. Would the proposal:

- | | Potentially Significant Impact | No Impact |
|--|-------------------------------------|-------------------------------------|
| a) Violate any air quality standard or contribute to an existing or projected air quality violation? | ☒ | ☐ |
| b) Expose sensitive receptors to pollutants? | ☐ | ☒ |
| c) Alter air movement, moisture, or temperature, or cause any change in climate? | ☐ | ☒ |
| d) Create objectionable odors? | ☐ | ☒ |
| e) Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s). | ☐ | ☒ |

TABLE 2-1

CEQA Significance Thresholds	
Carbon Monoxide	150 pounds per day
Particulate Matter (PM10)	150 pounds per day
Sulfur Oxides (SOx)	55 pounds per day
Volatile Organic Compounds	55 pounds per day
Nitrogen Oxides	55 pounds per day

The proposed amendments will result in emission reductions of approximately 3.06 tons per day. The reductions will be achieved as follows: 0.97 tons per day from drains; 0.89 tons per day from junction boxes, and 1.20 tons per day from manhole covers. The 0.97 tons per day from drains is attributed to better enforcement, a revised emission inventory and further control and monitoring of problem drains. In addition, all newly installed drains after the implementation of the proposed amendments must be sealed or covered in some way. The emission reductions from junction boxes and manhole covers are attributable to a 500 ppm limit being placed on these technologies. The 3.06 tons per day of emission reductions is beneficial to air quality.

There are approximately 141 bulk terminals in the district which must comply with the requirements of Rule 1176. Due to the negligible emissions associated with wastewater systems at bulk terminals, the proposed amendments seek to remove this source category from the rule. Removal from Rule 1176 would mean that bulk terminals could exceed the 500 ppm limit for wastewater systems and would not have to comply with other rule requirements or monitoring limits. In order to examine the emission increase associated with the proposed removal from Rule 1176, a single bulk terminal with a high throughput was used to make assumptions about

the rest of the source category. VOC emissions from sumps at the sample facility amounted to 209 pounds per year. Applying this assumed worst-case scenario to all 141 facilities resulted in a total emission increase of approximately 81 pounds per day.

Junction boxes and manhole covers were required to be enclosed or covered under the current rule. The AQMD does not believe bulk terminal facilities will choose to remove the covers or lids currently on any manhole covers or junction boxes. These lids provide a level of safety and cleanliness for the facility. There is no reason why a facility would choose to remove the lid simply because it was no longer a rule requirement. There is no emission fee billing (EFB) data currently being submitted for junction boxes and manhole covers. Since the AQMD does not assume that facilities will remove their lids and since the bulk terminals will not be subject to the new provisions of the rule which include a 500 ppm limit for these source categories, the AQMD concludes therefore that emissions from junction boxes and manhole covers at bulk terminals are negligible.

The AQMD currently uses an emission correlation equation developed and approved by the U.S. EPA to calculate fugitive emissions from drains. There are far fewer drains at bulk terminals than refineries. No bulk terminals submitted drain information on their EFB forms. Assuming a worst-case scenario that all 141 bulk terminals had 10 drains at each facility, there would be 1,410 drains that would no longer need to comply with the 500 ppm limit. Applying the correlation equation to 1,410 drains results in an emission increase of 112 pounds of VOC per day. The total emission increase resulting from the exemption of bulk terminals from Rule 1176 would be 193 pounds of VOC per day. Emission reductions from bulk terminal drains was never included in AQMD's emission inventory. Therefore, the net effect on the emissions inventory does not change as a result of the exemption and the only actual emission increase experienced is 81 pounds per day from the wastewater systems at the bulk terminals. Despite the potential increase of VOC emissions from bulk terminals, the amendments as a whole result in overall emission reductions of 2.96 tons per day (6120 pounds per day - 81493 pounds per day). Therefore, there is still a significant air quality benefit associated with the proposed project.

AIR QUALITY IMPACTS FROM CONTROL EQUIPMENT

The Flameless Thermal Oxidizer (FTO) is a control technology that may be used to comply with the provisions for junction boxes and manhole covers where there is a high positive flow rate. AQMD staff analyzed the use of FTOs to comply with Rule 1176 and determined that less than 14% of the universe of sources (18) would need an FTO or alternative add-on control technology. It was then also determined, however, that one facility using carbon adsorption on four of its junction box vents may need to replace it, possibly with FTOs. The AQMD also included another 5 FTOs for facilities that have variable flow rates. Therefore, it is assumed that there may be 27 FTOs installed as a result of the proposed amendments.

Operation of the FTO results in small amounts of nitrogen oxides (NOx) emissions. A review of literature on the FTO shows that the emissions are typically at 2 part per million (ppm) NOx. As the worst case, it is assumed that each source will need a 5 standard cubic feet per meter (cfm) FTO to comply with the 500 ppm requirement. On 27 units in the district, this would result in 17 pounds of NOx per year. This emission increase is within the AQMD's CEQA significance threshold of 55 pounds per day and is, therefore, considered insignificant. Energy usage as a result of the FTO is analyzed under "Energy Impacts." The emission impacts associated with the energy use are negligible.

Sulfur emissions from the use of FTOs were also evaluated. A review of literature determined that sulfur emissions will be negligible from the use of the FTO. Any resulting sulfur emissions would be a factor of the sulfur compounds in the drainage system. Under normal operating conditions, there will be little or no sulfur in the drainage system. Regardless, however, the sulfur emissions would not be a factor of the control technology but of the drainage content itself. Therefore, the AQMD finds that there will be no resulting SOx emissions as a result of the FTO.

OTHER OXIDATION DEVICES

Thermal oxidation and catalytic oxidation may be used to comply with the proposed amendments. These approaches are not the most cost-effective but have been analyzed nonetheless. These control technologies may create adverse air quality impacts in the district because of the combustion product generated by these equipment types. This type of combustion equipment may generate emissions of CO, NOx, VOC and other products of incomplete combustion. Table 2-2 highlights the associated emissions if all 27 junction boxes needed an oxidation device to comply with the 500 ppm limit.

TABLE 2-2
EMISSIONS FROM 27 OXIDATION DEVICES¹

Oxidation Device	NOx (lbs./day)	VOC (lbs/day)	CO (lbs/day)
Thermal	46.2	3.6	9.3
Catalytic	9.3	0.8	1.8
Regenerative	21.7	1.8	4.3
Regenerative	12.4	1.0	2.4

Emissions associated with the use of any of the oxidizers shown above would not exceed CEQA's significance threshold for any criteria pollutants. (see Table 2-1).

¹ The analysis assumes the control device will operate 24 hours per day with an exhaust flow rate of 500 cfm.

Emission reductions associated with the proposed amendments are an air quality benefit regardless of the control technology used for compliance. There are no significant adverse air quality impacts associated with the proposed project.

Potentially
Significant
Impact

No Impact

VI. TRANSPORTATION/CIRCULATION. Would the proposal result in:

- a) Increased vehicle trips or traffic congestion? ☐ ☒
- b) Hazards to safety from design features (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)? ☐ ☒
- c) Inadequate emergency access or access to nearby uses? ☐ ☒
- d) Insufficient parking capacity on-site or off-site? ☐ ☒
- e) Hazards or barriers for pedestrians or bicyclists? ☐ ☒
- f) Conflicts with adopted policies supporting alternative transportation (e.g. bus turnouts, bicycle racks)? ☐ ☒
- g) Rail, waterborne or air traffic impacts? ☐ ☒

The proposed amendments will not result in any adverse transportation/circulation impacts. The amendments apply to specific components of the wastewater system at currently operating facilities in the district. There are no provisions in the rule that would hinder corridor access or adversely impact bicyclists or pedestrians. Parking capacity would not be impaired nor would any additional parking need to be constructed as a result of the rule amendments.

	Potentially Significant Impact	No Impact
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VII. BIOLOGICAL RESOURCES. *Would the proposal result in impacts to:*

- | | | |
|---|--------------------------|-------------------------------------|
| a) Locally designated natural communities (e.g. oak forest, coastal habitat, etc.)? | ☐ | ☒ |
| b) Wildlife dispersal or migration corridors? | ☐ | ☒ |

No direct or indirect impacts from the proposed rule were identified that could adversely affect plant or animal species or the resources on which they rely. A conclusion of the 1994 AQMP EIR was that population growth in the region would have greater effects on plant species and wildlife dispersal or migration corridors than any air quality control measures. The current and expected future land development to accommodate population growth is primarily due to economic considerations and/or local government planning decisions, not air quality rule implementation. The proposed amended rule will not affect growth or land use development and, therefore, will not create significant adverse direct or indirect impacts to biological resources.

	Potentially Significant Impact	No Impact
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VIII. ENERGY AND MINERAL RESOURCES. *Would the proposal:*

- | | | |
|---|-------------------------------------|-------------------------------------|
| a) Conflict with adopted energy conservation plans? | ☐ | ☒ |
| b) Use non-renewable resources in a wasteful and inefficient manner? | ☐ | ☒ |
| c) Result in the need for new or altered energy utilities (e.g., power or natural gas)? | ☒ | ☐ |

Some facilities may opt to install add-on pollution control equipment at their junction boxes to comply with the provisions of the rule. Specifically, it is feasible that a flameless thermal oxidizer (FTO) could be installed at junction boxes where there is a high positive flow where water seals and covers may not be effective. The AQMD examined the junction box inventory to determine which junction boxes may need to be vented to a vapor recovery device, such as the FTO. There were approximately 18 junction boxes identified, along with four from one facility

currently using carbon adsorption and 5 that have a variable flow rate. If these 27 junction boxes installed FTO, the resulting energy usage would be 81 kilowatt hours per hour. Energy needed to run this equipment is minimal and well within the energy available in the district. No additional energy would need to be generated to accommodate this control equipment.

Small compressors may also be needed to supply the FTO with forced air needed to run the FTO system. Most facilities have compressors on site, however, for purposes of analyzing a worst-case possibility, it was assumed that all 27 FTOs will need a separate compressor. The energy needed to run a 1 horsepower compressor is 1.3 kilowatt hours per hour assuming a 90 percent efficiency. This increase, too, is well within the district's energy supply.

Thermal and catalytic oxidation devices could also be used on the 27 junction boxes identified as possibly needing to be vented to a control device. A thermal or catalytic oxidizer operating at 500 cubic feet per minute will need between .25 and 1 kilowatt per 500 cfm. Since it is assumed that no more than 27 oxidizers will be installed, this would be 27 kilowatts per 500 cfm as a worst-case scenario. This increased energy demand can easily be accommodated using the current electricity supply in the district.

Energy impacts associated with the proposed amendments will be insignificant prior to mitigation.

	Potentially Significant Impact	No Impact
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IX. HAZARDS. *Would the proposal involve:*

- | | | |
|--|-------------------------------------|-------------------------------------|
| a) A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals or radiation)? | ☒ | ☐ |
| b) Possible interference with an emergency response plan or emergency evacuation plan | ☐ | ☒ |
| c) The creation of any health hazards or potential health hazard? | ☐ | ☒ |
| d) Exposure of people to existing sources of potential health hazards? | ☐ | ☒ |
| e) Increased fire hazard in areas with flammable brush, grass, or trees? | ☐ | ☒ |

There are no hazards associated with the FTO control technology because there are two safety valves on the equipment that would preclude it from pressure build up and explosion. The equipment is set up so that the equipment shuts down if the lower explosion limit (LEL) reaches an unsafe level. When the equipment shuts down, an alarm sounds informing facility personnel that the VOCs have reached an unsafe pressure level. The equipment takes approximately one hour to start back up.

The temperature of the FTO equipment is also monitored by safety equipment. If the temperature in the FTO exceeds a safe level, the equipment also shuts down and an alarm sounds. It is for these reasons that there are no hazards associated with this control technology.

There are no hazard impacts associated with water seals or covers. If the pressure or VOC concentration at these areas reached a high level, the seals would break releasing the pressure and preventing an explosion. In addition, the amendments included an exemption for sewer lines if covering the lines would cause unavoidable fire or explosion potential.

It is also important to note that the rule does not mandate covering any junction box vents or manhole covers, but rather, that the VOC emissions from wastewater systems parts not exceed 500 parts per million (ppm) at any targeted location.

Potentially Significant Impact	No Impact
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X. NOISE. Would the proposal result in:

- | | | |
|---|--------------------------|-------------------------------------|
| a) Increases in existing noise levels? | ☐ | ☒ |
| b) Exposure of people to severe noise levels? | ☐ | ☒ |

Some types of air pollution control equipment generate noise. The proposed project may result in the use of control equipment such as FTOs or carbon adsorption. The control equipment would only be applied at existing facilities in the district and is not expected to disrupt any residential area or reach an unhealthy level for personnel at facility. The noise which these types of control equipment may generate would not be expected to be detectable beyond the facility confines, and would therefore, not adversely affect the public. Therefore, there are no significant adverse noise impacts associated with the proposed project.

XI. PUBLIC SERVICES. Would the proposal have an effect upon, or result in a need for new or altered government services in any of the following areas?

- | | Potentially Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|
| a) Fire protection? | ☐ | ☒ |
| b) Police protection? | ☐ | ☒ |
| c) Schools? | ☐ | ☒ |
| d) Maintenance of public facilities, including roads? | ☐ | ☒ |
| e) Other governmental service? | ☐ | ☒ |

The proposed project will not have a significant impact on public services. There are no hazards associated with the rule and, therefore, it presents no adverse impacts for fire protection agencies. The amendments will not require the alteration of roadways or hinder the maintenance of those corridors. The AQMD has the appropriate staffing to accommodate the rule changes. AQMD enforcement personnel already conducts inspections on these facilities as part of the current rule. Therefore, inspections would not increase as a result of the rule and AQMD staffing levels would not be impaired.

Potentially Significant Impact	No Impact
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XII. SOLID/HAZARDOUS WASTE. Would the proposal:

- | | | |
|--|-------------------------------------|--------------------------|
| a) Result in the need for new or substantial alterations to solid or hazardous waste disposal utility systems? | ☒ | ☐ |
|--|-------------------------------------|--------------------------|

Additional solid waste could be generated as a result of spent carbon needed disposal, possibility in a Class I landfill. The proposed amendments would expand the applicability of using carbon adsorption as a control measure which has potential adverse solid waste impacts.

Impacts to solid waste as a result of carbon adsorption have been analyzed in the 1989 Determination of No Significant Impacts and found to be insignificant. The amount of carbon adsorption likely to be used to comply with the existing rule far exceeds the increased use which

might occur as a result of the amendments. In fact, one facility has expressed that it may remove some carbon adsorption systems as a result of the proposed amendments and choose another compliance option. Even when considered cumulatively, the potential solid waste impacts of Rule 1176 would be insignificant.

Please refer to the 1989 Determination of No Significant Impacts for a complete analysis of this control technology.

XIII. AESTHETICS. *Would the proposal:*

- | | Potentially Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|
| a) Affect a scenic vista or scenic highway? | ☐ | ☒ |
| b) Have a demonstrable negative aesthetic effect? | ☐ | ☒ |
| c) Create light or glare? | ☐ | ☒ |

The proposed amendments will not result in any new construction of buildings and, thus, would not result in adverse affects to scenic vistas. Likewise, additional light or glare would not be created since no additional light generating equipment would be required for the rule's implementation. The proposed amendments may require add-on control equipment at existing facilities but will not affect any scenic vista or highway.

XIV. CULTURAL RESOURCES. *Would the proposal:*

- | | Potentially Significant Impact | No Impact |
|--|--------------------------------|-------------------------------------|
| a) Disturb paleontological resources? | ☐ | ☒ |
| b) Disturb archaeological resources? | ☐ | ☒ |
| c) Have the potential to cause a physical change which would affect unique ethnic cultural values? | ☐ | ☒ |

Significant adverse impacts to cultural resources are not expected because the proposed rule amendments apply to existing facilities that do not have any prehistoric, historic, archaeological, religious, or ethnic significance.

XV. RECREATION. *Would the proposal:*

- | | Potentially Significant Impact | No Impact |
|---|--------------------------------|-------------------------------------|
| a) Increase the demand for neighborhood or regional parks or other recreational facilities? | ☐ | ☒ |
| b) Affect existing recreational opportunities? | ☐ | ☒ |

The proposed rule has no potential to affect recreational opportunities in the jurisdiction of the AQMD, for the same reasons as noted for population and housing.

XVI. MANDATORY FINDINGS OF SIGNIFICANCE.

- | | Potentially Significant Impact | No Impact |
|--|--------------------------------|-------------------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☒ |
| b) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? | ☐ | ☒ |
| c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects) | ☐ | ☒ |
| d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☒ |

c) The proposed project does not have the potential to adversely impact any environmental category on a cumulative level. Past rule development regarding this source category did not result in adverse project-specific or cumulative impacts. It is not expected that the current project will alter this finding in any way. Since proposed amended Rule 1176 does not generate significant adverse impacts in any environmental area, it does not contribute to significant adverse cumulative environmental impacts.

APPENDIX A

COMMENTS AND RESPONSES

Comment Letter #1 - County Sanitation Districts of Los Angeles County

2-17 August 1996

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COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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CHARLES W. CARRY
Chief Engineer and General Manager

July 29, 1996

File No: 31-380.10B

COMMENT LETTER #1

Ms. Tara Tisopolos
South Coast Air Quality
Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Dear Ms. Tisopolos:

CEQA Analysis for Proposed Amended Rule (PAR) 1176 VOC Emissions from Wastewater Systems

Thank you for sending us a copy of the CEQA analysis for PAR 1176 and discussing the concerns of the County Sanitation Districts of Los Angeles County (LACSD) regarding PAR 1176 with Mr. Ferrante.

This letter is a follow-up to your discussion with Mr. Ferrante in which you agreed that the language in the CEQA analysis under Chapter II Section IV Water will be changed to reflect the following:

1. The 1.7 percent figure is for a drain system that is ventilated to a control device and not sealed.
2. The proposed amendments may have a significant water quality impact and therefore LACSD will monitor the discharges from subject facilities.
3. If there is a significant impact (adverse effect on wastewater treatment and/or biosolids, failure to meet NPDES permit limits, etc.), the rule will be reopened for review and amendment.

Comment Letter #1

County Sanitation Districts of Los Angeles County
July 29, 1996

1. Thank you for your comments. The text in Item II, Water, has been modified to state that the 1.7 percent figure is for a ventilated drain system.

2. Based upon the analysis in the SEA, AQMD staff does not believe that the proposed amendments will result in significant adverse water quality impacts. The calculation methodology provided by the commentator shows that emissions being transferred to the wastewater could be slightly more than 100 pounds per day. The AQMD has agreed, however, to modify the text in the "Water" discussion to indicate that the local sanitation districts will continue monitoring wastewater from regulated facilities to determine whether there are actual water quality effects from the proposed amendments. The AQMD has also agreed to assist LACSD to resolve any matters related to their waste discharge limits, or reexamining the analysis conducted for the rule amendment.

3. To address the commentator's concern, the text in the "Water" section has been modified to state that if proposed amended Rule 1176 result in a conflict with Sanitation District's NPDES permit conditions, South Coast Air Quality Management District's staff will assist Sanitation District's to examine all possible measures to mitigate such impacts; which measures may include providing assistance to Sanitation Districts in meeting with the Regional Water Quality Control Board to resolve any potential matters related to their NPDES permit limits, or reexamining the analysis conducted for this rule amendment.

JUL-28-86 11.13 FROM: LACSD AIR QUALITY SMC ID: 3108-929630 PAGE 3/3

Ma. Tera Tlapalos 2 July 29, 1996

Thank you for your time and consideration on this matter. If you have any questions, please contact Mr. Robert Ferrante at (310) 699-7411, extension 2138.

Yours very truly,

Charles W. Carr

Gregory M. Adams

Gregory M. Adams
Assistant Departmental Engineer
Office Engineering Department

GMA:RFT

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