

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Final Subsequent Environmental Assessment for:

Proposed Amended Rule 1420.1 Emissions Standard for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities

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PREFACE

This document constitutes the Final Subsequent Environmental Assessment (SEA) for Proposed Amended Rule (PAR) 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities. This SEA is subsequent to PAR 1420.1 Final EA –January 2014. The Draft SEA was released for a 30-day public review and comment period from July 22, 2015 to August 20, 2015. No comment letters were received from the public relative to the environmental analysis in the Draft SEA.

Subsequent to the release of the Draft SEA, minor additions and modifications were made to this SEA for clarification purposes. To facilitate identifying the modifications in the document, changes are included as underlined text and text removed from the document are indicated by ~~striketrough~~. None of the modifications alter any conclusions reached in the Draft SEA. As a result, these minor revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5. Therefore, this document now constitutes the Final SEA for PAR 1420.1.

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CHAPTER 1

PROJECT DESCRIPTION

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INTRODUCTION

Rule 1420.1 – Emission Standards for Lead from Lead-Acid Battery Recycling Facilities was adopted on November 5, 2010 and applies to large lead-acid battery recycling facilities that process more than 50,000 tons of lead a year. Rule 1420.1 was amended on January 10, 2014 to reduce other toxic (i.e. arsenic, benzene, and 1,3-butadiene) emissions from affected facilities. It was amended again on March 7, 2014, to include a multi-metals demonstration program to continuously monitor lead, arsenic, and other metals and clarify language that requires affected facilities to reimburse the South Coast Management District (SCAQMD or District) for funds spent to deploy independent third-party contractors who conduct investigations of unplanned shutdowns according to Rule 1420.1. The amendment renamed the rule as Rule 1420.1 - Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities, to reflect these changes. The March 2015 amendment lowered the ambient lead concentration limit and point source lead emission rate, as well as adding other housekeeping and maintenance measures. The purpose of Rule 1420.1 is to protect public health by reducing exposure to emissions of lead, arsenic, benzene, and 1,3 butadiene from these facilities and to help ensure attainment of the National Ambient Air Quality Standard for lead.

SCAQMD staff is currently proposing amendments to Rule 1420.1 to further reduce lead emissions at large lead acid battery recycling facilities to continue to protect public health. Proposed Amended Rule (PAR) 1420.1 lowers the point source limit to reduce the amount of lead emitted into the air from point sources; thereby reducing the further accumulation of lead dust in and around the facility to better ensure protection of public health.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

Amending Rule 1420.1 is a discretionary action, which has the potential to result in direct or indirect changes to the environment and, therefore, is considered a “project” as defined by the California Environmental Quality Act (CEQA). SCAQMD is the lead agency for the proposed project and has prepared this ~~Draft~~ Final Subsequent Environmental Assessment (SEA) pursuant to its Certified Regulatory Program (CEQA Guidelines § 15251). California Public Resources Code §21080.5 allows public agencies with regulatory programs to prepare a plan or other written document in lieu of an environmental impact report or negative declaration once the Secretary of the Resources Agency has certified the regulatory program. SCAQMD's regulatory program was certified by the Secretary of the Resources Agency on March 1, 1989, and is codified as SCAQMD Rule 110.

CEQA and SCAQMD Rule 110 require that potential adverse environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, this ~~Draft~~ Final SEA addresses the potential adverse environmental impacts associated with the proposed project according to CEQA Guidelines § 15252. It states that the lead agency has an obligation to identify and evaluate the environmental effects of the project. The Draft SEA is an informational document intended to: (a) provide the lead agency, responsible agencies, decision makers and the general public with information on the environmental effects of the proposed project; and, (b) identify possible ways to minimize the significant effects.

A Subsequent EA is the appropriate CEQA document for the proposed project because there are subsequent changes proposed to Rule 1420.1 (CEQA Guidelines §15162). The proposed project is a

modification of an earlier project and this analysis considers only the incremental effects of the proposed project.

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted EIR or Negative Declaration covering the project for which a subsequent discretionary action is required. The SCAQMD prepared this SEA to the previously adopted EA. This SEA is governed by Section 15162 (a) of the CEQA Guidelines, which provides that where a negative declaration has been adopted for a project, “no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) 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 EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

Section 15162(b) provides that if a subsequent EIR is not required under 15162 (a), then “the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.”

SCAQMD’s review of the proposed project shows that the proposed project is not expected to generate significant adverse affects on the environment. Pursuant to CEQA Guidelines §§ 15126.4 (a)(3), and 15126.6, mitigation measures and alternatives are not required for effects which are not found to be significant, thus, no mitigation measures or alternatives to the project are included in

the ~~draft~~ Final SEA. In addition, because SCAQMD has a certified regulatory program, the Environmental Assessment is an appropriate substitute for an EIR or Negative Declaration. Pursuant to CEQA Guidelines § 15252(a)(2)(B) and supported by the environmental checklist (in Chapter 2), if the project would not have any significant or potentially significant effect on the environment, “no alternatives or mitigation measures are proposed to avoid or reduce any significant effects on the environment.” ~~Comments received on the Draft SEA during the 30-day public review period will be addressed and included in the Final SEA.~~ The Draft SEA was released for a 30-day public review and comment period from July 22, 2015 to August 20, 2015. No comment letters were received on the Draft SEA during the comment period.

PROJECT LOCATION

The SCAQMD has jurisdiction over an area of 10,473 square miles, consisting of the four-county South Coast Air Basin (Basin) and the Riverside County portions of the Salton Sea Air Basin (SSAB) and the Mojave Desert Air Basin (MDAB). The Basin, which is a subarea of the SCAQMD’s jurisdiction, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The 6,745 square-mile Basin includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The Riverside County portion of the SSAB and MDAB is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley (see Figure 1-1).

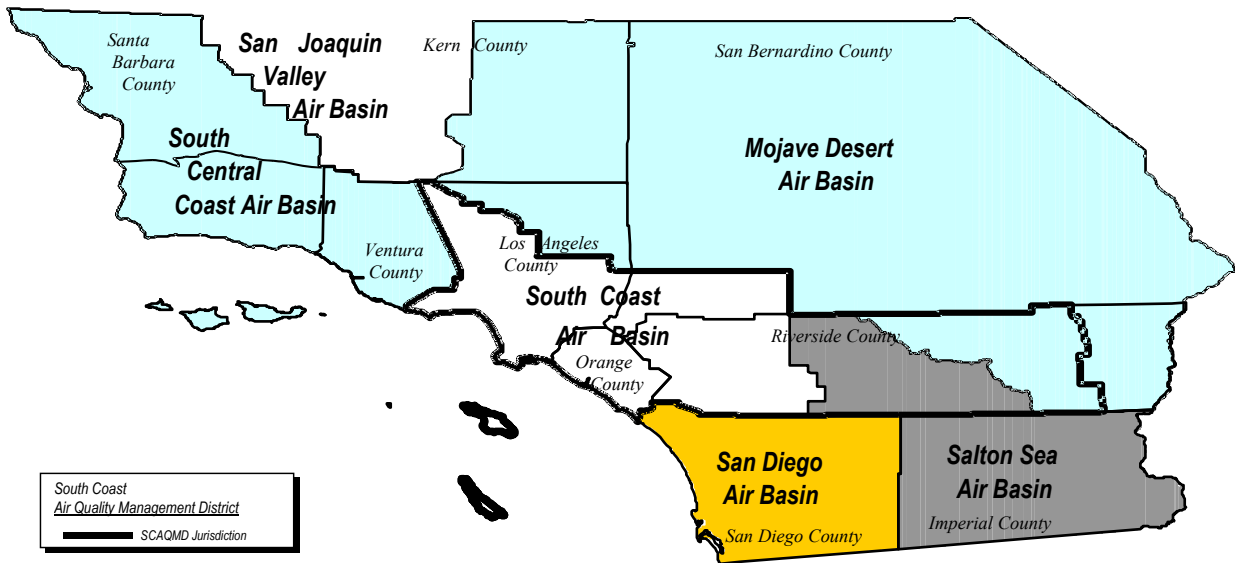


Figure 1-1 Boundaries of the South Coast Air Quality Management District

PROJECT OBJECTIVES

The objectives of PAR 1420.1 are to protect public health by further reducing lead emissions from large lead-acid battery recycling facilities by:

- Reducing the total facility point source emission limit for lead; and
- Clarifying applicability for large lead-acid battery recycling facilities that are closing and closure requirements.

PROJECT BACKGROUND

Health Effects of Lead

Lead is classified as a “criteria pollutant” under the federal Clean Air Act. It is also identified as a carcinogenic toxic air contaminant (TAC) by the Office of Environmental Health Hazard Assessment (OEHHA). Chronic health effects include problems such as nervous and reproductive system disorders, neurological and respiratory damage, cognitive and behavioral changes, and hypertension. Also, exposure to lead may increase the risk of contracting cancer or result in other adverse health effects. Young children are especially susceptible to the effects of environmental lead given that their bodies accumulate lead more readily than do adults and because they are more vulnerable to certain biological effects of lead including learning disabilities, behavioral problems, and deficits in IQ.

During the U.S. EPA’s recent review of the lead NAAQS the U.S. EPA Administrator concluded that the current lead NAAQS of $0.15 \mu\text{g}/\text{m}^3$ should be retained given that it provides requisite protection of public health. However, the Administrator noted that a threshold blood-lead level with which nervous system effects, and specifically, cognitive effects, occur in young children cannot be discerned from the currently available studies. Further, in the U.S. EPA’s recent Policy Assessment for the Review of the Lead NAAQS, the U.S. EPA explicitly stated “with regard to our understanding of the relationship between exposure or blood lead levels in young children and neurocognitive effects, the evidence in this review...does not establish a threshold blood lead level for neurocognitive effects in young children. Furthermore, based on information provided in the U.S. EPA’s recent policy assessment document and proposed rule, an ambient lead concentration of $0.15 \mu\text{g}/\text{m}^3$ correlates to a potential IQ decrement of approximately (2) points in young children exposed to elevated levels of lead.

Regulatory History

Lead-acid battery recyclers have been subject to environmental air quality regulations for more than two decades. Below is a chronology of regulatory activities:

- In November 1970, CARB set the state ambient air quality standard for lead at 1.5 microgram per cubic meter averaged over 30 days.
- In October 1978, the U.S. EPA adopted the National Ambient Air Quality Standards (NAAQS) for lead requiring attainment with a lead ambient concentration of 1.5 microgram per cubic meter averaged over a calendar quarter.
- In September 1992, the SCAQMD adopted Rule 1420 – Emissions Standard for Lead. The rule incorporated the state ambient air quality standard and required control devices on lead emission points, control efficiency requirements for lead control devices, housekeeping, and monitoring or modeling of ambient air quality.
- In October 1992, OEHHA classified lead as a carcinogenic toxic air contaminant and assigned to it a cancer potency factor and a cancer unit risk factor.

- June 1997, the U.S. EPA adopted the National Emissions Standards for Hazardous Air Pollutants (NESHAP) from Secondary Lead Smelting. The federal regulation required lead emission concentration limits of lead control devices, control of process fugitive emissions, monitoring, recordkeeping, and reporting.
- On July 16, 2007, EPA finalized a regulation that affects lead emissions from all lead-acid battery manufacturing facilities that are area sources. The federal regulation required lead emission concentration limits, testing, monitoring, recordkeeping, and reporting requirements.
- On October 15, 2008, the U.S. EPA signed into regulation an amended NAAQS for lead of $0.15 \mu\text{g}/\text{m}^3$.
- November 5, 2010, the SCAQMD adopted Rule 1420.1 – Emissions Standard for Lead from Large Lead-acid Battery Recycling Facilities. The rule established requirements for total enclosures of areas used in the lead-acid battery recycling operation, ambient air lead concentration limits, ambient air monitoring, and housekeeping practices. Additional rule amendments followed the initial adoption in January of 2014, March of 2014, and March of 2015.
- December 14, 2010, the U.S. EPA made final revisions to the ambient monitoring requirements for measuring lead in the air. These amendments expand the nation's lead monitoring network to better assess compliance with the 2008 National Ambient Air Quality Standards for lead.
- January 2, 2015, the U.S. EPA proposed that the ambient lead concentration standard of $0.15 \mu\text{g}/\text{m}^3$ averaged over a rolling 3-month period remain unchanged. The 90-day comment period for this proposal ended on April 6, 2015 and requires further action by the U.S. EPA.

The following provides additional background information about Rule 1420 and the 2008 NAAQS for lead.

Rule 1420

Rule 1420 was adopted in September 1992 and has not been amended since its adoption. Rule 1420 applies to facilities that process or use lead-containing materials that include, but is not limited to, primary or secondary lead smelters, foundries, lead-acid battery manufacturers or recyclers, and lead-oxide, brass and bronze producers. Rule 1420 is based on the current state ambient air quality standard of $1.5 \mu\text{g}/\text{m}^3$ averaged over a 30-day period. The rule includes requirements for point source controls, monitoring, sampling, recordkeeping, and reporting. Rule 1420 requires facilities that process more than two tons of lead per year to submit a Compliance Plan that provides information on how the facility will conduct monitoring, air dispersion modeling, and implement requirements to install and implement point source controls.

2008 NAAQS for Lead

Since U.S. EPA established the initial standard of $1.5 \mu\text{g}/\text{m}^3$ in 1978, scientific evidence about lead and health has expanded dramatically. More than 6,000 new studies on lead health effects, environmental effects, and lead in the air have been published since 1990. Evidence from health studies shows that adverse effects occur at much lower levels of lead in the blood than previously thought. As a result, U.S. EPA amended the NAAQS for lead that now reduces the ambient air quality standard from $1.5 \mu\text{g}/\text{m}^3$ to $0.15 \mu\text{g}/\text{m}^3$. The 2008 lead NAAQS requires full attainment by each state no later than five years after final designations for attainment status are made. Demonstration of attainment is based on measurements using a rolling 3-month averaging form to

be evaluated over a 3-year period. Measurements are to be determined by U.S. EPA-required monitoring networks within each state which consist of both source-oriented and non-source-oriented monitors. The SCAQMD has already established the required monitoring network for both source and non-source-oriented lead monitors.

Further, in May of 2014, the U.S. EPA released its “Policy Assessment for the Review of the Lead National Ambient Air Quality Standards,” reaffirming the primary (health-based) and secondary (welfare-based) staff conclusions regarding whether to retain or revise the current standards. As a result, in January of 2015 the U.S. EPA proposed that the ambient lead concentration standard of 0.15 µg/m³ averaged over a rolling 3-month period remain unchanged. The 90-day comment period for this proposal ended on April 6, 2015 and requires further action by the U.S. EPA.

The SCAQMD Governing Board has authority to adopt PAR 1420.1 pursuant to the California Health and Safety Code Sections 39002, 39650 et. seq., 40000, 40001, 40440, 40441, 40702, 40725 through 40728, 41508, 41700 and 41706.

Compliance Determination-Monitoring

The demonstration of attainment of the lead standard is to be based on measurements using a rolling 90 day averaging form to be evaluated over a three-year period. Measurements are to be determined by EPA-required monitoring networks within each state which consist of both source-oriented and non-source-oriented monitors. The SCAQMD has already established the required monitoring network for both source and non-source-oriented lead monitors. Since 2012, the District has not exceeded the federal lead standard.

Ambient air lead concentrations are determined through use of high-volume total suspended particulate samplers placed throughout the South Coast Air Basin and at both upwind and downwind locations of the facilities where maximum ambient concentrations are expected. They measure lead and arsenic concentrations in the ambient air over a midnight-to-midnight, 24 hour period.

Point source emission rates are determined by source tests to demonstrate compliance with the mass emission standards specified in the rule. They are “snapshots” of the efficiency of the control equipment and are conducted when the equipment is installed and annually or biannually thereafter. The tests are conducted in accordance with SCAQMD, CARB or EPA test methods.

Affected Facilities

PAR 1420.1 applies to large lead-acid battery recycling facilities that process more than 50,000 tons of lead annually. Currently there are only two facilities subject to Rule 1420.1 in the SCAQMD: Exide Technologies and Quemetco Inc. Exide Technologies is located in Vernon (Los Angeles County) and Quemetco, Inc. is located in the City of Industry (Los Angeles County).

As discussed further below, Exide is in the process of permanently closing their facility. As a result, the point source limit of PAR 1420.1 will only be applicable to Quemetco because Exide is no longer in operation. In addition, although the closure provisions will be applicable to both facilities, they are immediately applicable to Exide and will be analyzed in that context. It is assumed that the closure analysis for Quemetco would be similar.

Closure of Exide Technologies In Vernon, CA

On April 7, 2015 Exide Technologies withdrew their California Department of Toxic Substance Control (DTSC) permit application and provided notification of its intent to permanently close. On May 15, 2015, Exide Technologies submitted a revised Closure Plan to DTSC. The Closure Plan provides a detailed status of the facility and contains decontamination and demolition plans. The Closure Plan also includes groundwater monitoring information, engineering controls, waste characterization, and air monitoring plans. The Closure Plan is separate from, but is occurring simultaneously with, the DTSC Corrective Action imposed on Exide. The Corrective Action requires off-site cleanup of nearby residential and industrial areas, as well as cleanup of on-site contaminated groundwater.

Based on the Closure Plan submitted to DTSC, Exide's closure is expected to occur in three phases. The first phase will involve the removal of inventory, equipment decontamination and removal, decontamination and deconstruction of buildings, and soil sampling. Exide expects to implement dust mitigation measures and will retain a third-party environmental consultant to monitor and document implementation of those measures and to conduct real-time air monitoring. Exide plans to continue operating emission air pollution control equipment to maintain negative pressure on associated buildings while the inventory is removed and gross cleaning of duct work is complete. Once the duct work has been removed up to the emission control equipment, the ducts shall be blinded and the interior of the equipment cleaned following manufacturer's operating procedures. For internal, decontamination of structures, it will be done under negative pressure by vacuum cleaning vented to HEPA filters and then pressure washing. The Closure Plan requires that any decontamination of the exteriors of structures must occur within a temporary enclosure (e.g., scaffolding enclosed with plastic) with negative pressure. The most recent revision of the Closure Plan does not require that roofs have temporary enclosures while they are decontaminated and deconstructed. SCAQMD staff commented on this Closure Plan requesting that this provision be included in the Final Closure Plan. This ~~Draft~~ Final SEA evaluates the construction of a temporary enclosure above the facility roofs during external decontamination as part of this project in the event that the Final Closure Plan does not include this requested provision.

Phase 2 will address potential below-grade decontamination. These additional activities may require the removal of contaminated soil beneath the concrete floor at the closure areas; capping and installation of boundary markers where contaminated soils are left in place; and development of a deed notice/land use covenant. The scope of Phase 2 will be determined using data generated during Phase 1 and may be influenced by data generated during the Corrective Action. Generally areas will be excavated to a depth of five feet in and around structures. Dust control measures such as temporary enclosures and water will be used during floor removal and excavation activities. The temporary enclosure will remain in-place and/or the area will be covered until the excavation is complete.

When Phase 1 and Phase 2 are completed, the facility will submit certification by both the facility and an independent, qualified engineer registered in the State of California within 60 days of the completion of final closure, to DTSC, SCAQMD and the City of Vernon. This certification will state that the facility has been closed in accordance with the approved closure plan. Phase I of the closure is expected to commence March 2016 and be completed by May 2018. Phase II is scheduled for completion by June 2020.

Phase III (ongoing) would include post-closure and contingent post-closure work to implement long-term inspections, monitoring, and maintenance. Phase III is scheduled to last until 2049.

Ambient Air Monitoring

The affected facilities have several air monitors throughout their sites. These monitors are used to determine compliance with the ambient concentration limits. They measure lead and arsenic concentrations in the ambient air over a midnight-to-midnight, 24 hour period. See Figure 1-2 and for Figure 1-3 Exide and Quemetco’s Ambient Monitoring Locations, respectively.

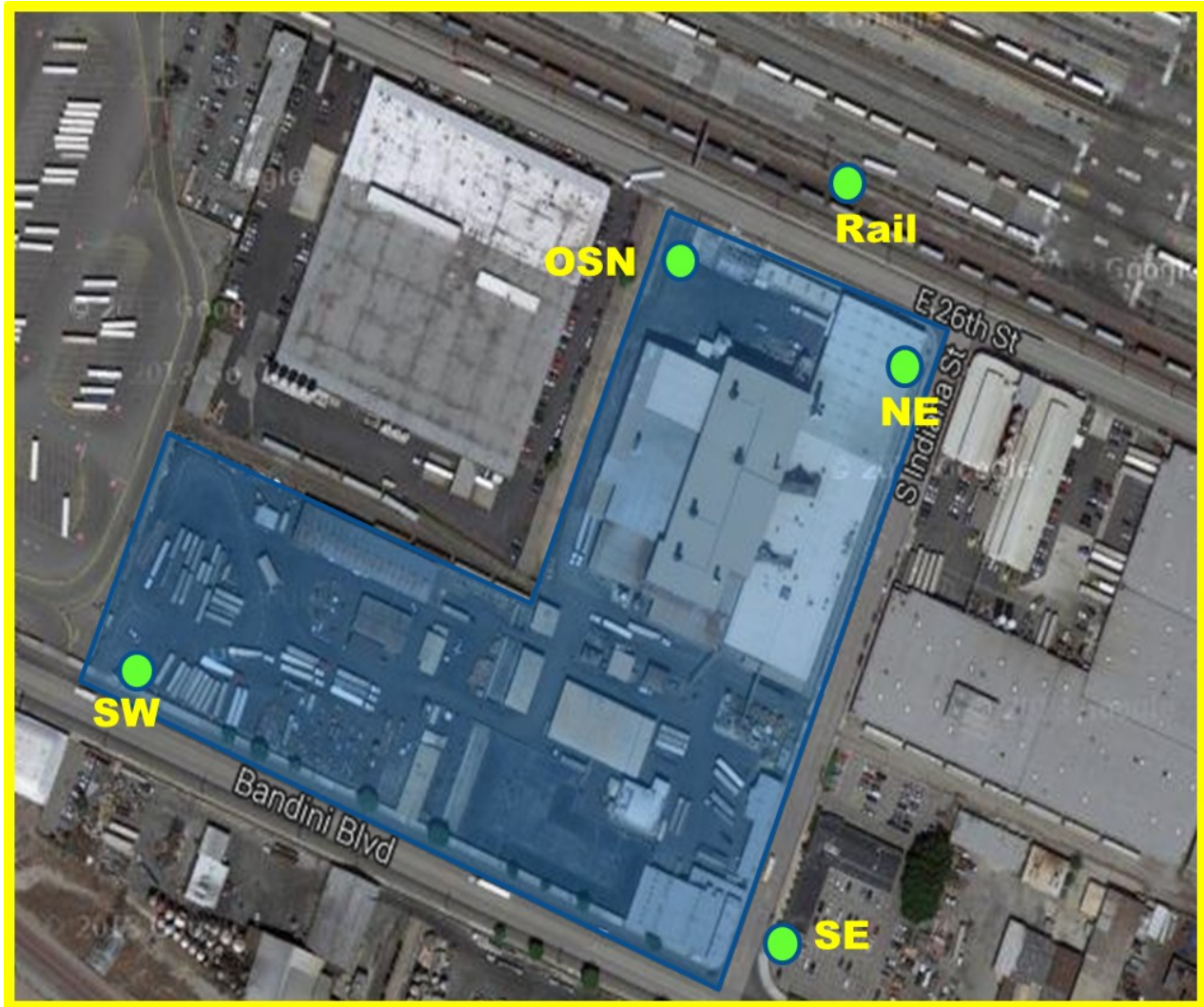


Figure 1-2 Exide’s Ambient Monitoring Stations

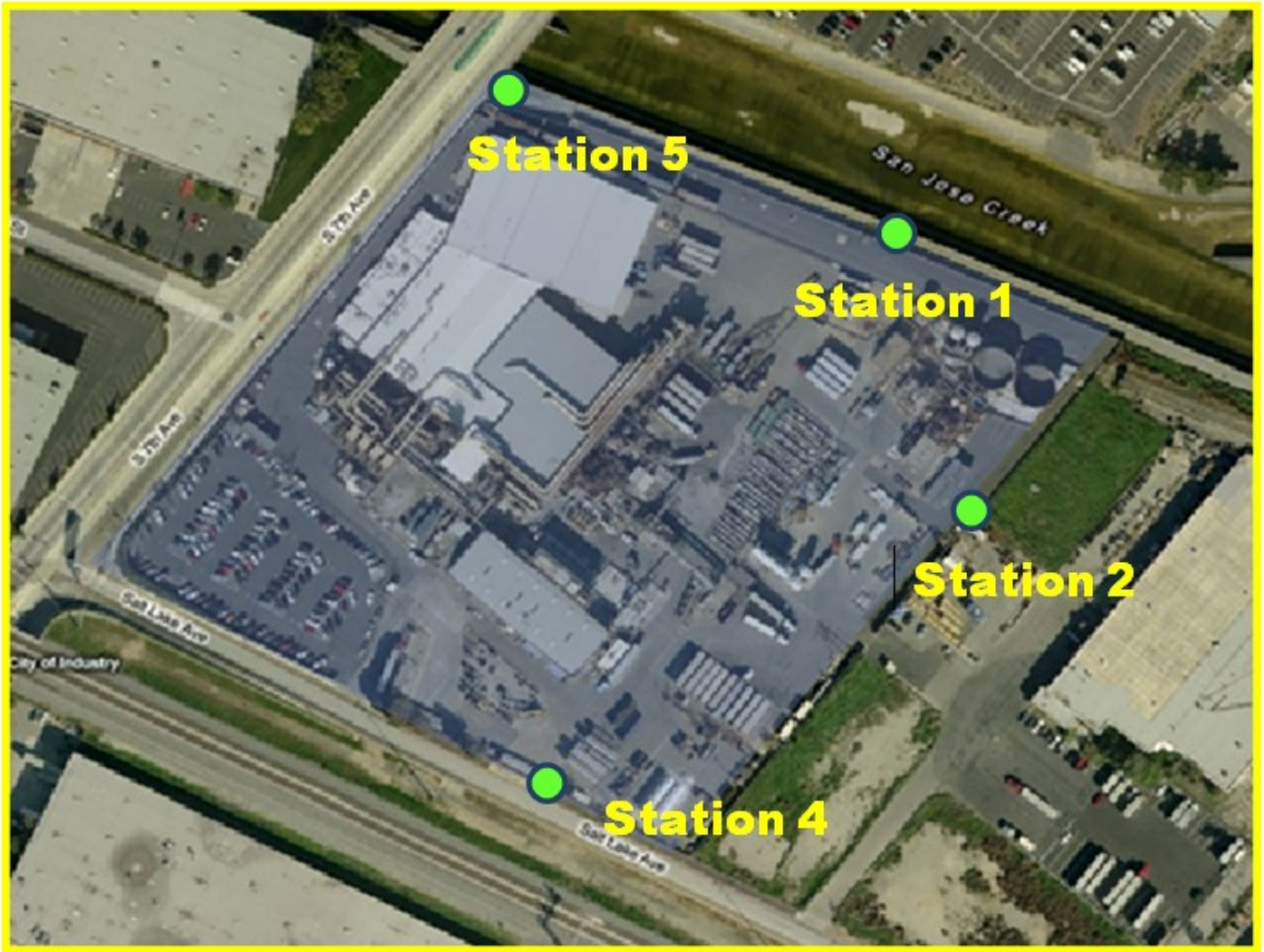


Figure 1-3 Quemetco's Ambient Monitoring Stations

Overview of Existing Operations

Lead-acid battery recycling facilities are secondary lead smelting operations where spent lead-acid batteries, mostly automotive, and other lead-bearing materials are received from various sources and processed to recover lead, plastics, and acids. The process mainly involves the sorting, melting, and refining of lead-acid batteries, which ultimately produces lead ingots that are then made into new batteries or sold to other entities. Figure 1-4 is a Simplified Flow Diagram of the Process. Below is a general description of the lead recycling process at the affected facilities including potential lead emission points:

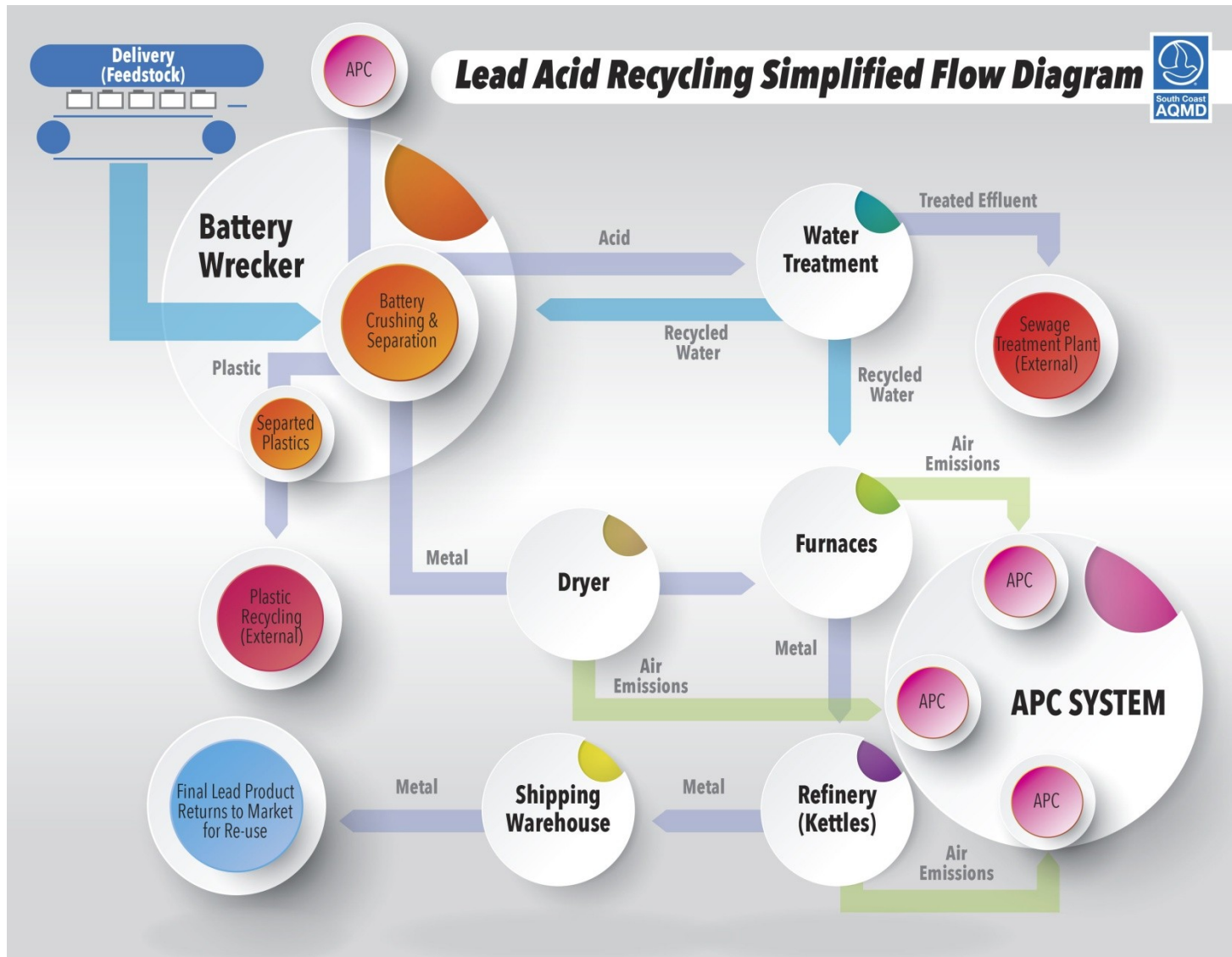


Figure 1-4-Lead Acid Recycling Simplified Flow Diagram

Phase I – Raw Materials Processing: Lead-bearing materials recovered from lead-acid batteries are prepared and processed prior to being charged (loaded) to a smelting furnace. The feedstock for lead-acid battery recycling facilities can fluctuate. Although the majority of the feedstock is plastic-cased car batteries, other lead-bearing items are also sometimes processed (e.g., steel-cased batteries).

Receiving and Storage: Spent lead-acid batteries are usually received on pallets that are either stored or sent directly to conveyors for immediate crushing.

Battery Breaking/Crushing: The spent lead-acid batteries are unloaded from conveyors and loaded into a hammer mill system where they are crushed whole. Both Quemetco and Exide's battery breaking areas are located in a total enclosure that is vented to an emission collection system pursuant to Rule 1420.1. The crushed material is then placed into a series of tanks filled with water in order to filter out any plastic and rubber components of the battery casing and to clean materials of the acids. Through buoyancy effects, the crushed metal material sinks to the bottom of the tanks and goes through a series of screens to further isolate lead-bearing materials. Arsenic and other metals can be found in the lead-bearing materials due to battery parts such as the posts and grids containing alloys of arsenic and lead. The materials are then typically stored in open or partially covered piles if not required for immediate charge preparation.

Charge Preparation/Rotary Drying/Sweating: Recovered lead-bearing materials are prepared by blending it with stored lead scrap and reagents prior to being charged to a furnace. The metallic scrap materials are placed in dryers to remove moisture prior to charging to a furnace in order to reduce furnace upsets (puffs and explosions). Some unfiltered plastic and rubber components of the battery casing may be inadvertently introduced into the dryer during this process. The materials are then sweated (subjected to temperatures above the melting temperature of lead, but below that of the other metals) to separate lead from other metals with higher melting points. The process of melting of plastic and rubber parts from the partial combustion of carbon coke (mainly in the dryers) generates toxic organic emissions.

Phase II – Smelting: Smelting is the production of crude lead by melting and separating the lead from metallic and non-metallic contaminants and by reducing lead compounds to elemental lead. Smelting is carried out in the blast, electric resistance, reverberatory, and rotary kiln furnaces. These furnaces emit high levels of metal particulates during the charging and tapping processes in addition to toxic organic emissions.

Cupola (Blast) furnaces: Typically, "hard" lead, or antimonial lead (containing approximately 10 percent antimony) is produced in blast furnaces. Scrap metal, re-run slag, scrap iron, coke, recycled dross, flue dust (which contain lead and arsenic), and limestone are used as charge materials to the furnace. Process heat is produced by the reaction of the charged coke with blast air that is blown into the furnace. Currently, Exide utilizes a blast furnace, which generates benzene and 1,3-butadiene emissions.

Electric resistance furnaces: Electric resistance furnaces generate heat from molten slag that offers resistance to the passage of a current through it. Electric energy is converted into heat when a current flows through electrodes directly into the furnace charge (i.e., the material to be heated). Electric resistance furnaces typically generate less airborne emissions (lead and arsenic) compared to blast or reverberatory furnaces, which utilize combustion processes to generate the

heat necessary to melt the furnace charge materials. Currently, Quemetco is the only lead-acid battery recycler in the SCAQMD utilizing an electric resistance furnace. Quemetco's electric resistance furnace is typically used to further separate lead-containing materials from non lead-containing materials contained in the lead slag produced from the reverberatory furnace.

Reverberatory furnaces: Semi-soft lead (containing approximately three to four percent antimony) is produced in reverberatory furnaces, which generate lead and arsenic emissions. Lead scrap, metallic battery parts, oxides, dross, and other residues are used as charge materials to the furnace. The charge materials are heated directly using natural gas, which generate benzene and 1,3-butadiene emissions. Reverberatory furnaces are used by both Exide and Quemetco.

Phase III – Refining and Casting: Refining and casting the crude lead from the smelting process can consist of softening, alloying, and oxidation, depending on the degree of purity or alloy type desired. Crude lead produced during smelting operations is remelted and refined by the addition of reagents, such as sulfur and caustic soda. The purified lead is then cast into molds or ingots. Refining furnaces and kettles are typically gas or oil-fired and maintained at operating temperatures between 600 to 1,300 degrees Fahrenheit. Arsenic fumes may be emitted when molten lead is transferred to refining kettles and lead particulates may become airborne off refining kettle contents due to thermal rise processes.

Alloying furnaces: Alloying furnaces are kettle furnaces used to simply melt and mix ingots of lead and alloy materials, such as antimony, tin, arsenic, copper, and nickel. Other reagents used include sodium hydroxide, sodium nitrate, carbon coke, calcium metal, sodium metal, and phosphates.

Refining furnaces: Refining furnaces are used to either remove copper and antimony for soft lead production, or to remove arsenic, copper, and nickel for hard lead production. Sulfur may be added to the molten lead to remove copper. The resultant copper sulfide is skimmed off as dross and may be processed in a blast furnace to recover residual lead. Aluminum chloride is used to remove copper, antimony, and nickel.

Oxidizing furnaces: Either kettle or reverberatory units are used to oxidize lead and to entrain the product lead oxides in the combustion air stream for subsequent recovery in high-efficiency baghouses.

PROJECT DESCRIPTION

The following is a summary of the proposed amendments to PAR 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Lead-Acid Battery Recycling Facilities. A copy of PAR 1420.1 with the specific details of the amendments can be found in Appendix A. Both the following and Appendix A constitute a project description.

Subdivision (a) – Purpose

No change.

Subdivision (b) – Applicability

The proposed rule will clarify that applicability covers lead-acid battery recycling facilities during closure activities. PAR1420.1 applies until the proposed closure requirements in paragraph (p)(4) are satisfied. Continued compliance with the rule is necessary to ensure that attainment with the lead NAAQS will be maintained and that surrounding communities suffer no degradation in air quality during closure, including demolition, cleanup and decontamination activities.

Subdivision (c) – Definitions

No change.

Subdivision (d) – General Requirements

No change.

Subdivision (e) – Total Enclosures

No change.

Subdivision (f) –Point Source Emissions Controls

Effective September 4, 2015, the total facility mass lead emissions from all sources will be reduced from 0.023 pounds per hour to 0.003 pounds per hour.

Subdivision (g) – Compliance Plan

No change.

Subdivision (h) – Housekeeping Requirements

No change.

Subdivision (i) – Maintenance Activity

No change.

Subdivision (j) –Ambient Air Monitoring Sampling Requirements

No change.

Subdivision (k) – Source Tests

PAR 1420.1 will eliminate the biennial source test option for facilities that demonstrate a lead point source emission rate of 0.0012 lb/hr or less. The proposed rule will require annual source testing for point sources that emit lead.

Subdivision (l) – New Facilities

No change.

Subdivision (m) – Recordkeeping

No change.

Subdivision (n) – Reporting

No change.

Subdivision (o) – Curtailment Requirements

Effective upon adoption of PAR 1420.1, the first tier of the total facility mass emission rate for process curtailments in Table 2 of subparagraph (o)(2) will be reduced to coincide with the proposed reduction of total facility lead point sources emission rate under subparagraph (f)(1)(A) from 0.023 lb/hour to 0.003 lb/hour.

Subdivision (p) – Large Lead-Acid Battery Facility Closure Requirements

PAR 1420.1 includes provisions for lead-acid battery recycling facility owner and operators to ensure no degradation to air quality occurs during facility closure activities such as demolition, decontamination, and cleanup. Facility closure entails permanently stopping production and notifying the Execution Officer in writing that the facility will no longer be in operation.

In the proposal, facilities that are closing will be required to submit a Compliance Plan for Closure Activities and continue conducting daily lead and arsenic ambient monitoring (paragraphs (d)(1), (d)(5) and (d)(6)). The Compliance Plan for Closure Activities would be submitted in advance of decontamination and demolition actions taking place. It would specify the housekeeping and maintenance measures to be taken to prevent lead or arsenic ambient exceedances. The facility can tailor the plan to address specific decontamination or demolition procedures. For example, the plan could include building washing provisions while the building remains intact but discontinuing building washing provisions once the buildings have been demolished. The plan is expected to be updated as closing activities proceed to provide added flexibility. The plan would also require that contingency provisions be included that can be implemented in the event there is an exceedance of the lead or arsenic ambient concentrations. These contingency plans would likely be additional housekeeping and maintenance measures such as increased frequency of washing, sweeping and vacuuming as well as specific measures for demolition-related emissions.

If the lead or arsenic ambient concentrations exceed rule requirements, all closure related activities that contributed to the exceedance shall be suspended until contingency measures in the Approved Compliance Plan for Closure Activities can be implemented. If the exceedance is due to a previously unidentified activity for which the contingency measures do not address, then a revised Compliance Plan for Closure Activities will be required to be submitted and approved by the Executive Officer before closure related activities that contributed to the exceedances resume. While the revised plan is not intended to be as comprehensive as Compliance Plan for Closure Activities, it is necessary to address the cause of the exceedances prior to resuming to ensure that attainment with the lead NAAQS will be maintained and that surrounding communities suffer no degradation in air quality.

Facilities will be required to continue monitoring and abiding by the Compliance Plan for Closure Activities until the lead-acid battery recycling facility has surrendered all air permits to the Executive Officer, submitted DTSC-approved certification of final closure to SCAQMD, receives written confirmation from the Executive Officer that final closure has been verified and there are no exceedances of ambient lead or arsenic concentrations for 12 consecutive months, with at least one month occurring on or after the date of submittal of certification of final closure.

Subdivision (q) – Exemption

An exemption has been included in PAR 1420.1 to specify which provisions of the rule do not apply to a facility that has permanently ceased production and notified the Executive Officer in writing that the facility is permanently closing. If the facility has ceased production, point source emission rate limits, operational Compliance Plans, source testing and curtailment requirements are no longer necessary.

Subdivision (r) – Severability

No change.

Appendix 1 – Content of Initial Facility Status Reports

No change.

Appendix 2 – Content of Ongoing Facility Status Reports

No change.

Appendix 3 – Continuous Furnace Pressure Monitoring (CFPM) Plan

No change.

EMISSIONS CONTROL TECHNOLOGIES

Existing Controls

The impacted facilities are secondary lead smelting operations where spent automotive and other lead-bearing materials are processed to recover lead, plastics and acids. The process generally involves the sorting, smelting and refining of raw materials for the purpose of producing lead ingots. Lead, arsenic and other toxic or criteria pollutant emissions are vented directly to air pollution control equipment, captured in building enclosures and then vented to air pollution control equipment or are fugitive emissions that do not get captured by air pollution control equipment and come into contact with ambient air.

Quemetco uses baghouses or filter systems to control arsenic and lead emissions from process operations and building enclosures. Quemetco vents all the exhaust from particulate control to a centralized wet electrostatic precipitator (WESP). In addition, Quemetco has a regenerative thermal oxidizer (RTO) and scrubber. It is anticipated that the proposed rule will not result in any additional control devices or physical changes at Quemetco.

Exide vents particulate emissions to a variety of secondary, tertiary and even quaternary control devices. These devices include high efficiency particulate arrestors, cyclones, scrubber and thermal oxidizers. During facility closure, it is anticipated that Exide will continue to operate the negative air pressure enclosures to reduce the fugitive dust emissions from closure activities for as long as possible, at least until after all internal and external surfaces have been decontaminated and the structures themselves need to be demolished.

Compliance with PAR 1420.1

With respect to the facility point source limit in PAR 1420.1, existing lead point source tests demonstrate that Quemetco is already complying with the new proposed limit (0.003 lb/hr) for lead. Exide is in the process of closing their facility and the limit will not have an impact on its operations. Therefore, no additional point source emission control strategies are anticipated at either affected facilities.

With respect to the proposed closure requirements of PAR 1420.1, fugitive emissions can accumulate in and around process areas, from point sources, raw material storage areas, on roof tops, and during maintenance operations to name a few. Both facilities currently employ a variety of housekeeping and containment strategies to minimize fugitive emissions. Based on existing Rule 1420.1 requirements and strategies used by the facilities, fugitive emissions are controlled through use of total enclosures with negative air pressure that are vented to pollution control devices, procedures for containment during maintenance activities, and a number of housekeeping provisions. During facility closure, PAR 1420.1 will require continued compliance with these housekeeping and monitoring requirements. A Compliance Plan for Facility Closure would additionally require identification of more specific measures (include housekeeping, maintenance, continued use of total enclosures and possibly other measures to minimize fugitive dust emissions) directed at specific closure activities anticipated by the facility.

Ambient Source Control Strategies for Lead

Fugitive Lead-Dust Control

Fugitive lead-dust at lead-acid battery recycling facilities can be a major source of lead emissions. Fugitive lead-dust accumulates in and around process areas, from lead point sources,

on roof tops, in and around facility, and during maintenance operations to name a few. There are a variety of housekeeping and containment strategies that can be implemented to minimize fugitive lead dust. Housekeeping activities must be implemented frequently and properly to ensure they are effective. The concept behind many of these strategies is to either contain or remove lead dust so it cannot become airborne. Housekeeping practices specifying adequate frequencies and locations for all cleanings to be performed are also critical in the effectiveness to control fugitive lead-dust emissions. The following summarizes some potential fugitive lead dust control strategies:

- Paving or using chemical stabilizers or water on unpaved areas subject to vehicular and foot traffic;
- Cleaning of paved areas through vacuuming, vacuum sweepers, and use of wet suppression;
- Wet washing or vacuuming of areas such as roof tops and lead storage and disposal areas where lead particulate can accumulate;
- Cleaning (i.e. sweeping, vacuuming, dusting) areas where lead dust may accumulate due to accidents, process upsets or equipment malfunctions;
- Using enclosures or containment areas during maintenance activities or storage of lead-containing materials; and equipment;
- Using total enclosures under negative air pressure vented to point lead point source controls to ensure that lead dust that accumulates in and around process areas does not become fugitive; Using a vehicle wet washing station that removes dust and other accumulated material from the wheels, body, and vehicle underside and prevents the inadvertent transfer of lead contaminated material to public roadways. The stations are used by all vehicles traversing facility areas associated with the lead-acid battery recycling process prior to exiting the facility and onsite mobile sweepers after operation. Ground surfaces where vehicles are washed could be required to be wet washed prior to the vehicle wet washed areas becoming dry to prevent any fugitive lead-dust or residue from becoming airborne. Practices that minimize the potential for further releases of lead emission when collecting and disposing of lead contaminated water accumulated during washing processes would be required. Practices would include the minimization of the amount of water which is allowed to dry exposed to the atmosphere prior to collection for treatment.

CHAPTER 2

Introduction

General Information

Environmental Factors Potentially Affected

Determination

Discussion and Evaluation of Environmental Checklist

INTRODUCTION

The environmental checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the proposed project.

GENERAL INFORMATION

Project Title:	Proposed Amended Rule 1420.1
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive, Diamond Bar, CA 91765
Rule Contact Person:	Michael Morris, (909) 396-3282
CEQA Contact Person:	Cynthia Carter, (909) 396-2431
Project Sponsor's Name:	South Coast Air Quality Management District
Project Sponsor's Address:	21865 Copley Drive, Diamond Bar, CA 91765
General Plan Designation:	Not applicable
Zoning:	Not applicable
Description of Project:	PAR 1420.1 would further protect public health by reducing lead emissions produced by large lead-acid battery recycling facilities. PAR 1420.1 would accomplish this by lowering the total facility lead point source limit to 0.003 pounds per hour, clarify that the rule applies during closure, and include new provisions to ensure lead and arsenic emissions are appropriately controlled during closure and clean-up activities, and thereafter. The environmental analysis in the Draft <u>Final</u> SEA concluded that PAR 1420.1 would not generate any significant adverse environmental impacts. PAR 1420.1 would affect two facilities that are on lists of California Department of Toxics Substances Control hazardous waste facilities per Government Code §65962.5 (http://www.envirostor.dtsc.ca.gov/public ; accessed on June 17, 2015).
Surrounding Land Uses and Setting:	Large industrial/commercial facilities recycling lead-acid batteries
Other Public Agencies Whose Approval is Required:	None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The following environmental impact issues have been assessed to determine their potential to be affected by the proposed project. As indicated by the checklist on the following pages, environmental topics marked with a "✓" may be adversely affected by the proposed project. An explanation relative to the determination of the significance of the impacts can be found following the checklist for each area.

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Population and Housing |
| <input type="checkbox"/> Agricultural Resources | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use and Planning | <input checked="" type="checkbox"/> Solid/Hazardous Waste |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Transportation/Traffic |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Mandatory Findings |

DETERMINATION

On the basis of this initial evaluation:

- I find the proposed project, in accordance with those findings made pursuant to CEQA Guideline §15252, COULD NOT have a significant effect on the environment, and that a SUBSEQUENT ENVIRONMENTAL ASSESSMENT with no significant impacts has been prepared.
- I find that although the proposed project could have a significant effect on the environment, there will NOT be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. A SUBSEQUENT ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- I find that the proposed project MAY have a significant effect(s) on the environment, and a SUBSEQUENT ENVIRONMENTAL ASSESSMENT will be prepared.
- I find that the proposed project MAY have a "potentially significant impact" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. A SUBSEQUENT ENVIRONMENTAL ASSESSMENT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL ASSESSMENT pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL ASSESSMENT, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: July 21, 2015

Signature:



Jillian Wong, Ph.D.
Program Supervisor, CEQA Section
Planning, Rules, and Area Sources

DISCUSSION AND EVALUATION OF ENVIRONMENTAL IMPACTS

The environmental impacts associated with the current requirements in Rule 1420.1 have already been analyzed in previous CEQA documents prepared for the rule. The ~~Draft~~-Final SEA analyzes all closure (and post-closure) impacts from the proposed amendments, however this is a conservative approach as some closure provisions in this rule amendment are just a clarification that current provisions apply through closure. The analysis contained herein only focuses on the environmental impacts which would result from the proposed amendments to the rule (such as the lower total facility point source limit for lead, and facility closure requirements). The objective of PAR 1420.1 is to further reduce the public's exposure to lead that is associated with lead emissions from large lead-acid recycling facilities. PAR 1420.1 is establishing more stringent requirements for these facilities. One of the key components of PAR 1420.1 is reducing the total facility lead point source limit and incorporating closure requirements (see Chapter 1- Project Description for a thorough discussion on the proposed rule requirements). Based on existing lead point source tests, Quemetco is already complying with the proposed rule's total facility point source limit (0.003 lb/hr) for lead and no further actions are necessary. Additionally, Exide is in the process of closing their facility. See Table 2-1 for details that the lower point source limit is already being met by both facilities.

Table 2-1 Lead Point Source Test Results

	Facility	
	Quemetco ¹	Exide
Lead Point Source Emission Rate (lb/hr)	0.000341	N/A ²
PAR 1420.1 New Point Source Limit (lb/hr)	0.003	0.003
Compliance with New Limit?	Yes	N/A

There will be no physical changes at Quemetco. Exide will be in the process of demolishing their facility for the next few years. In order for Exide to comply with PAR 1420.1 during closure, Exide will continue their current monitoring and some housekeeping and maintenance activities, as well as maintain the total enclosures or construct temporary total enclosures on-site.

For the purpose of the CEQA analysis, reasonable worst-case assumptions have been made. With respect to the lower facility lead point source limit, Quemetco is already complying with the proposed lower total facility lead point source limit and Exide is no longer operational and is starting the closure process. Thus, no impacts are expected for either affected facilities from this provision in PAR 1420.1.

With respect to the additional closure requirements in PAR 1420.1, they will apply to both facilities. Currently, Quemetco continues to operate while Exide is in the process of facility closure. Therefore, this analysis considers the impacts from closure of one facility at a time since concurrent closure of both facilities is not expected. It is anticipated that each facility will have to submit a closure plan to DTSC at which time, the environmental impacts associated with the closure plan will be addressed through a separate CEQA document. Therefore, this CEQA document only focuses on the environmental impacts associated with the closure requirements in PAR 1420.1. During closure, PAR 1420.1 will require the affected facilities to continue the

¹ Quemetco Source Test Results, 2/2014

² Exide is in the middle of closing their facility.

ambient air monitoring and total enclosure provisions until the closure is completed and submit a Compliance Plan for Closure Activities. The plan is expected to include continued use of total enclosures for as long as possible, at least until after all internal and external surfaces have been decontaminated and the structures themselves need to be demolished, then temporary enclosures would be built, as well as housekeeping and maintenance requirement similar to those currently in the rule but allowing flexibility to accommodate decontamination and demolition activities. The Closure Plan requires that any decontamination of the exteriors of structures must occur within a temporary enclosure (e.g., scaffolding enclosed with plastic) with negative pressure. The environmental analysis below conservatively includes the potential impacts from constructing these temporary enclosures even though they are part of another project subject to CEQA (i.e. DTSC's Closure Plan). The analysis below also includes an analysis of construction of temporary enclosures on the roof of the facility as a reasonably foreseeable component of this Rule amendment as it is not clear if the Closure Plan will include this provision.

Although the facilities are already complying with the provisions in the rule and those emissions are considered present in the CEQA baseline, these activities would extend until the facility completes the closure requirements. Therefore, operational impacts associated with continuing the applicable monitoring, housekeeping, and maintenance provisions, and total enclosure requirements during the closure process are analyzed here. In the event that ambient air concentrations during facility closure exceed the rule thresholds and triggers contingency measures, it is anticipated that in order to reduce emissions, the facility will enhance the housekeeping provisions by adding more workers to increase the frequency of washing and vacuuming performed on-site. For the purpose of analyzing potential environmental impacts, as a reasonable worst case assumption, it is assumed that the facility will add 8 construction workers per day, if a compliance plan is triggered.

Table 2-2 CEQA Summary of Fugitive Emissions Control Options During Facility Closure

Key Requirements	Potential Environmental Impacts	Environmental Topics to be Analyzed:
Ambient Air Monitoring*	Construction: None Operation: Collect Filters, Analyze Samples	Air Quality, Energy
Total Enclosure Under Negative Air Pressure	Construction: Temporary Enclosures Operation: None	Air Quality, Energy, Hazardous Material, Solid Waste, Transportation
Housekeeping Requirements	Construction: None Operation: Mobile Sweepers, Area washing, Haul waste, Wastewater, Roof washing, Water Tank Truck, Wheel Washing Station	Air Quality, Energy, Hazardous Material, Hydrology, Solid Waste, Transportation
Maintenance Requirements	Construction: None Operation: Water use	Air Quality, Hydrology & Water Quality
Contingency Measures	Construction: None Operation: Enhanced housekeeping measures will require additional workers; Additional water usage	Air Quality, Energy, Hydrology & Water Quality, Population & Housing, Transportation

**Air monitoring is required under the existing 1420.1 but has been included here as the proposed Rule amendment clarifies how monitoring will occur during closure activities.*

The stop work provisions of the rule are also not expected to have any significant impacts. These provisions are specifically designed to minimize the release of fugitive emissions. Although the provisions may have an impact on the schedule set forth in the DTSC/Exide Closure Plan, DTSC has advised that modifications to the closure plan are anticipated, but the environmental impacts from those modifications would be less than what is analyzed within this ~~Draft~~ Final SEA and/or DTSC's CEQA document; and DTSC expects and supports a stopping of closure activities if ambient exceedances are occurring. These facts further support a finding of less than significant impacts.

There are other housekeeping and maintenance provisions that do not have a quantifiable environmental impact; such as 5 mph speed limit, covered trash containers, storage of fugitive lead dust waste, inspection of enclosures, cleaning and storage of maintenance equipment, and transport in closed conveyor systems. Other rule language changes are administrative in nature and no environmental impacts would be expected.

ENVIRONMENTAL CHECKLIST AND DISCUSSION

I. AESTHETICS.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance Criteria

The proposed project impacts on aesthetics will be considered significant if:

- The project will block views from a scenic highway or corridor.
- The project will adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

Discussion

I. a) & b) Both facilities are located in industrial areas. Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction of permanent structures is expected at Quemetco or Exide for PAR 1420.1 compliance. Temporary covering of building surfaces would occur during some closure activities; however they would not be inconsistent with the general industrial nature of the surroundings. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers. No aesthetics will be affected from these activities.

These facilities are not located near scenic vistas, rock outcroppings, historical buildings or state scenic highways³.

The additional workers may require the use of vehicles and would be temporary (i.e., taken offsite after construction is finished), and therefore, are not expected to permanently alter the visual character or quality of the site and its surroundings. Therefore, the proposed project would not affect views of the trees from outside of the affected facility and would not significantly affect scenic vistas or damage scenic resources.

I. c) No construction of permanent structures is expected at Quemetco or Exide for PAR 1420.1 compliance. Temporary covering of building surfaces would occur during some closure activities; however they would not be inconsistent with the general industrial nature of the surroundings. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers. While the additional workers and their vehicles may be visible from outside of the affected property, it would be temporary and not degrade the views seen at adjacent facilities.

Therefore, PAR 1420.1 would not add significant degradation to the existing visual character or quality of the site and its surroundings.

I. d) Both affected facilities are twenty-four hour operations. The facilities are also located in industrial areas that are zoned for continuous operation. No construction of permanent structures is expected at Quemetco or Exide for PAR 1420.1 compliance. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers. Any additional lighting is expected to be similar to the existing onsite lighting and the surrounding facilities. Therefore, PAR 1420.1 is not expected to create a new source of substantial light or glare which would significantly adversely affect day or nighttime views in the area beyond current conditions.

Based upon these considerations, significant adverse aesthetics impacts are not anticipated and will not be further analyzed in this ~~Draft~~ Final SEA. Since no significant aesthetics impacts were identified, no mitigation measures are necessary or required.

³ DTSC, Exide Corporation hazardous Waste Facility Permit Draft Environmental Impact Report, SCH No. 93051013, June 2006

II. AGRICULTURE AND FOREST RESOURCES.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Project-related impacts on agriculture and forest resources will be considered significant if any of the following conditions are met:

- The proposed project conflicts with existing zoning or agricultural use or Williamson Act contracts.
- The proposed project will convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use.
- The proposed project conflicts with existing zoning for, or causes rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code § 51104 (g)).
- The proposed project would involve 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.

Discussion

II. a) & b) In general, the affected facilities and surrounding industrial areas are not located on or near areas zoned for agricultural use, 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. Therefore, the proposed project would not result in any construction of new buildings or other structures that would require converting farmland to non-agricultural use or conflict with zoning for agricultural use or a Williamson Act contract. Since the proposed project would not substantially change the facility or process at the facilities, there are no provisions in PAR 1420.1 that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements relative to agricultural resources would be altered by the proposed project.

IV. c) & d) The affected facilities are located in an industrial area in the urban portion of Los Angeles County that is not near forest land. Therefore, the proposed project is not expected to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104 (g)) or result in the loss of forest land or conversion of forest land to non-forest use.

Since PAR 1420.1 would not affect the placement of affected equipment near farmland, the proposed project is not expected to result in converting farmland to non-agricultural use; or conflict with existing zoning for agricultural use, or a Williamson Act contract. Similarly, it is not expected that PAR 1420.1 would conflict with existing zoning for, or cause rezoning of, forest land; or result in the loss of forest land or conversion of forest land to non-forest use. Consequently, the proposed project would not create any significant adverse agriculture or forestry impacts. Since no significant agriculture or forestry resources impacts were identified, this topic need not be evaluated further and no mitigation measures are necessary or required.

III. AIR QUALITY AND GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| exceed quantitative thresholds for ozone precursors)? | | | | |
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| h) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Significance Criteria

To determine whether or not air quality impacts from adopting and implementing the proposed project are significant, impacts will be evaluated and compared to the criteria in Table 2-3. The project will be considered to have significant adverse air quality impacts if any one of the thresholds in Table 2-3 are equaled or exceeded.

To determine whether or not greenhouse gas emissions from the proposed project may be significant, impacts will be evaluated and compared to the 10,000 MT CO₂/year threshold for industrial sources for SCAQMD lead agency projects.

To determine whether or not air quality impacts from the proposed project may be significant, impacts will be evaluated and compared to the criteria in Table 2-3.

Table 2-3 SCAQMD Air Quality Significance Thresholds

<i>Mass Daily Thresholds^a</i>		
Pollutant	Construction^b	Operation^c
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
<i>Toxic Air Contaminants (TACs), Odor, and GHG Thresholds</i>		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk \geq 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas \geq 1 in 1 million) Chronic & Acute Hazard Index \geq 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO ₂ eq for industrial facilities	
<i>Ambient Air Quality Standards for Criteria Pollutants^d</i>		
NO₂ 1-hour average annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM10 24-hour average annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^e & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
PM2.5 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^e & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
SO₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 $\mu\text{g}/\text{m}^3$ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day Average Rolling 3-month average	1.5 $\mu\text{g}/\text{m}^3$ (state) 0.15 $\mu\text{g}/\text{m}^3$ (federal)	

^a Source: SCAQMD CEQA Handbook (SCAQMD, 1993)

^b Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).

^c For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.

^d Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

^e Ambient air quality threshold based on SCAQMD Rule 403.

KEY: lbs/day = pounds per day ppm = parts per million $\mu\text{g}/\text{m}^3$ = microgram per cubic meter \geq = greater than or equal to
 MT/yr CO₂eq = metric tons per year of CO₂ equivalents > = greater than

Discussion

III. a) The SCAQMD is required by law to prepare a comprehensive district-wide Air Quality Management Plan (AQMP) which includes strategies (e.g., control measures) to reduce emission levels to achieve and maintain state and federal ambient air quality standards, and to ensure that new sources of emissions are planned and operated to be consistent with the SCAQMD's air quality goals. The AQMP's air pollution reduction strategies include control measures which target stationary, area, mobile and indirect sources. These control measures are based on feasible methods of attaining ambient air quality standards. Pursuant to the provisions of both the state and federal Clean Air Acts (CAA)s, the SCAQMD is required to attain the state and federal ambient air quality standards for all criteria pollutants, including lead. PAR 1420.1 would not obstruct or conflict with the implementation of the AQMP because lead emission reductions are in addition to emission reductions in the AQMP. The SCAQMD adopted the 2012 Lead State Implementation Plan (SIP) for Los Angeles County on May 4, 2012, which relies upon Rule 1420.1 for lead emission reductions. Further, on November 5, 2010, the Governing Board approved the 2010 Clean Communities Plan (CCP). The CCP is an update to the 2000 Air Toxics Control Plan (ATCP)⁴ and its 2004 Addendum. The objective of the 2010 CCP is to reduce the exposure to air toxics and air-related nuisances throughout the district, with emphasis on cumulative impacts. The elements of the 2010 CCP are community exposure reduction, community participation, communication and outreach, agency coordination, monitoring and compliance, source-specific programs, and nuisance.

PAR 1420.1 would reduce lead emissions and therefore, be consistent with the goals of the AQMP, 2012 Lead SIP for Los Angeles County, and the 2010 CCP. Therefore, implementing PAR 1420.1 that further reduces lead emissions would not conflict or obstruct implementation of the 2012 Lead SIP for Los Angeles County, AQMP or 2010 CCP.

III. b) and f) *Criteria Pollutants*

Construction Impacts

New Affected Facilities

SCAQMD staff is not aware of any new large lead recycling facilities planned to be constructed in the future. So the focus of the analysis will be on the two known affected facilities. At this time, construction of new large lead recycling facilities is considered speculative according to CEQA Guidelines §15145 and will not be evaluated further in this analysis.

Existing Affected Facilities

Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be constructed or needed.

Exide will need to construct temporary enclosures once their permanent enclosures have been demolished. See Table 2-4 for Construction Emissions and Appendix B for details on assumptions.

⁴ SCAQMD Air Toxics Control Plan: <http://www.aqmd.gov/home/library/clean-air-plans/clean-communities-plan/air-toxics-control-plan>

Table 2-4 Construction Emissions

Pollutant	Temporary Enclosures Emissions	Construction Significance Thresholds	Exceed Significance?
NO_x	47	100 lbs/day	No
VOC	5.8	75 lbs/day	No
PM₁₀	2.4	150 lbs/day	No
PM_{2.5}	2.2	55 lbs/day	No
SO_x	0.05	150 lbs/day	No
CO	22	550 lbs/day	No

Operational Impacts

Based on existing lead point source tests, Quemetco is already complying with PAR 1420.1's total facility point source limit (0.003 lb/hr) for lead. There will be no physical changes at Quemetco. Additionally, Exide is in the process of closing their facility. In order for Exide to comply with PAR 1420.1 during closure, Exide will continue the current monitoring, and is expected to continue some housekeeping and maintenance activities, as well as maintain the total enclosures on-site until the building is demolished. Therefore, PAR 1420.1 will not result in construction activities at either of the affected facilities.

For the purpose of the CEQA analysis, reasonable worst-case assumptions have been made: Since Quemetco is already complying with the proposed lower total facility lead point source limit and Exide is no longer operational and is starting the closure process, no impacts are expected for either affected facilities from PAR 1420.1. The additional closure requirements in PAR 1420.1 will affect both facilities during the closure process. Currently, Quemetco continues to operate while Exide is in the process of facility closure. Therefore, this analysis considers the impacts from closure of one facility at a time since concurrent closure of both facilities is not expected. It is anticipated that each facility will have to submit a closure plan to DTSC at which time, the environmental impacts associated with the closure plan will be addressed through a separate CEQA document. Therefore, this CEQA document only focuses on the environmental impacts associated with the requirements in PAR 1420.1 associated with the requirements in PAR 1420.1 that go beyond the DTSC Closure Plan. During closure, PAR 1420.1 will require the affected facilities to continue monitoring, and are expected to continue some housekeeping and maintenance requirements, as well as maintain total enclosures until the closure is completed.

Table 2-5 CEQA Summary of Fugitive Emissions Control Options During Facility Closure

Key Requirements	Potential Environmental Impacts	Environmental Topics to be Analyzed:
Ambient Air Monitoring*	Construction: None Operation: Collect Filters, Analyze Samples	Air Quality, Energy
Total Enclosure Under Negative Air Pressure	Construction: Temporary Enclosures Operation: Blowers	Air Quality, Energy, Hazardous Material, Solid Waste, Transportation
Housekeeping Requirements	Construction: None Operation: Mobile Sweepers, Area washing, Haul waste, Wastewater, Roof washing, Wheel Washing Station	Air Quality, Energy, Hazardous Material, Hydrology, Solid Waste, Transportation
Maintenance Requirements	Construction: None Operation: Water use	Air Quality, Hydrology & Water Quality
Compliance Plan	Construction: None Operation: Enhanced housekeeping measures will require additional workers; Additional water usage	Air Quality, Energy, Hydrology & Water Quality, Population & Housing, Transportation

**Air monitoring is required under the existing 1420.1 but has been included here as the proposed Rule amendment clarifies how monitoring will occur during closure activities.*

Although the facilities are already complying with the provisions in the rule and those emissions are considered present in the CEQA baseline, these activities will continue until the facility completes the closure requirements. Therefore, operational impacts associated with continuing the operation of APCDs, applicable monitoring, housekeeping and maintenance provisions, and total enclosure requirements during the closure process are conservatively analyzed here even though these activities are part of the current rule and the CEQA baseline activity. In the event that ambient air concentrations during facility closure exceed the rule thresholds and triggers contingency measures, it is anticipated that in order to reduce emissions, it is assumed that the facility will enhance the housekeeping provisions by adding more workers to increase the frequency of washing and vacuuming performed on-site. Since the facility will be in the process of closure, the only construction impacts are from temporary enclosures. Installation of additional pollution control equipment is not anticipated. For the purpose of analyzing potential environmental impacts, it is assumed that the facility will add 8 construction workers per day, if a compliance plan is triggered. The continued operation of the air handling systems and APCDs are expected to be powered by electricity, so no new combustion emissions from these pieces of equipment are expected to be generated. The air quality impacts associated with compliance with PAR 1420.1 are summarized in Table 2-6 SCAQMD Operational Criteria Pollutant Emissions below and do not exceed the SCAQMD thresholds of significance; therefore, impacts are less than significant.

Table 2-6 SCAQMD Operational Criteria Pollutant Emissions

Description	CO, lb/day	NO _x , lb/day	VOC, lb/day	SOX, lb/day	PM10, lb/day	PM2.5, lb/day
Heavy-Duty Sweeper ^a	0.89	2.69	0.46	0.44	0.49	0.39
Aerial Lift Delivery	0.96	3.06	0.24	0.00	0.15	0.13
Aerial Lift	1.26	2.16	0.40	0.00	0.15	0.14
Air Monitor Visit	0.66	0.07	0.07	0.00	0.01	0.00
Haul Disposal Trip	1.50	7.00	0.30	0.01	0.21	0.15
Water Tank Truck ^b	0.50	2.30	0.07	0.05	0.10	0.00
Compliance Plan – Vehicle trips from 8 additional workers	1.32	0.11	0.03	0.01	0.14	0.00
Total Operational Emissions	7.09	17.39	1.57	0.52	1.25	0.82
Significance Threshold	550	55	150	55	75	150
Exceed Significance?	No	No	No	No	No	No

^a Emissions are from the 2010 and 2015 Final 1420.1 EAs

^b Emissions are from the 2015 PAR 1420.1 Final EA-street sweeper, assumed same mileage and emission factors.

Indirect Criteria Pollutant Emissions from Electricity Consumption

Indirect criteria pollutant and GHG emissions are expected from the generation of electricity to operate new equipment that occurs off-site at electricity generating facilities (EGFs). Emissions from electricity generating facilities are already evaluated in the CEQA documents for those projects when they are built or modified. The analysis in the ~~Draft~~ Final SEA (Section VI. Energy b), c) and d)) demonstrates that there is sufficient capacity from power providers for the increased electricity consumption from PAR 1420.1. Under the RECLAIM program, EGFs were provided annual allocations of NO_x and SO_x emissions that decline annually. For this reason, emissions that may be created from EGFs providing electricity specifically for the proposed project would not increase regional NO_x and SO_x emissions, since the overall NO_x and SO_x emissions generated by EGFs would need to remain within the existing regional annual NO_x and SO_x allocations under the RECLAIM program. Lastly, because the NO_x and SO_x emissions are limited by the annual RECLAIM allocations, the other criteria pollutants that may be generated from combustion activities associated with electricity generation (e.g., CO, VOC, PM10, and PM2.5) are also limited by stoichiometry, and are already included in the existing setting of the CEQA baseline.

III. c) Cumulatively Considerable Impacts

The thresholds for cumulative impacts are the same as project-specific thresholds. Based on the foregoing analysis, criteria pollutant project-specific air quality impacts from implementing PAR 1420.1 would not exceed air quality significance thresholds (Table 2-3) and cumulative impacts are not expected to be significant for air quality. Potential adverse impacts from implementing PAR 1420.1 would not be "cumulatively considerable" as defined by CEQA Guidelines §15064(h)(1) for air quality impacts. Per CEQA Guidelines §15064(h)(4), the mere existing of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulative considerable.

The SCAQMD guidance on addressing cumulative impacts for air quality is as follows: “As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR.” “Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”⁵

This approach was upheld by the Court in *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal. App. 4th 327, 334. The Court determined that where it can be found that a project did not exceed the South Coast Air Quality Management District’s established air quality significance thresholds, the City of Chula Vista properly concluded that the project would not cause a significant environmental effect, nor result in a cumulatively considerable increase in these pollutants. The court found this determination to be consistent with CEQA Guidelines §15064.7, stating, “The lead agency may rely on a threshold of significance standard to determine whether a project will cause a significant environmental effect.” The court found that, “Although the project will contribute additional air pollutants to an existing nonattainment area, these increases are below the significance criteria...” “Thus, we conclude that no fair argument exists that the Project will cause a significant unavoidable cumulative contribution to an air quality impact.” As in *Chula Vista*, here the District has demonstrated, when using accurate and appropriate data and assumptions, that the project will not exceed the established South Coast Air Quality Management District significance thresholds. See also, *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal. App. 4th 899. Here again the court upheld the South Coast Air Quality Management District’s approach to utilizing the established air quality significance thresholds to determine whether the impacts of a project would be cumulatively considerable. Thus, it may be concluded that the Project will not cause a significant unavoidable cumulative contribution to an air quality impact.

Based on the foregoing analysis, project-specific air quality impacts from implementing the proposed project would not exceed air quality significance thresholds (Table 2-1); therefore, based on the above discussion, cumulative impacts are not expected to be significant for air quality. Therefore, potential adverse impacts from the proposed project would not be "cumulatively considerable" as defined by CEQA Guidelines §15064(h)(1) for air quality impacts. Per CEQA Guidelines §15064(h)(4), the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulative considerable.

III. d) Toxic Air Contaminants (TAC)

Construction

Construction is only expected at Exide. As toxic emissions from construction of onsite temporary enclosures is expected to be minor and take less than two months, no health risk assessment was

⁵ SCAQMD Cumulative Impacts Working Group White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution, August 2003, Appendix D, Cumulative Impact Analysis Requirements Pursuant to CEQA, at D-3, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4>.

conducted pursuant to guidance from the Office of Environmental Health Hazard Assessment (2015)⁶, and toxic impacts during construction are less than significant.

Operation

The goal of PAR 1420.1 is to ensure the continued reduction from lead and arsenic emissions from large lead-acid battery recycling facilities even as the facilities undergo closure. Therefore, PAR 1420.1 is expected to reduce toxic emissions and will not expose sensitive receptors to substantial concentrations.

Exide

TAC emissions may be generated from diesel exhaust emissions (i.e. heavy-duty trucks). Diesel exhaust particulate is considered a carcinogenic and chronic TAC. However, because their operations have ceased, no more trucks will bring lead-acid batteries for recycling during closure activities. Thus, TAC emissions impacts would be lower than their baseline and will have reduced impacts to nearby sensitive receptors.

Therefore, PAR 1420.1 is not expected to generate significant adverse TAC impacts from construction.

III. e) Odor Impacts

No construction is expected to occur on-site at Quemetco. Exide is an industrial facility where heavy-duty diesel equipment (sweepers) and trucks already operate. Therefore, the continued operations of mobile sources are not expected to generate diesel exhaust odor greater than what is already present. In addition, because their operations have ceased, no more trucks will bring lead-acid batteries for recycling during closure activities. Thus, odor impacts would be lower than their baseline. PAR 1420.1 compliance is designed to reduce TAC emissions from large lead battery recycling facilities, which may potentially further reduce odors. Therefore, PAR 1420.1 is not expected to generate significant adverse odor impacts.

III. g) and h) Greenhouse Gas Impacts

Global warming is the observed increase in average temperature of the earth's surface and atmosphere. The primary cause of global warming is an increase of greenhouse gas (GHG) emissions in the atmosphere. The six major types of GHG emissions are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs). The GHG emissions absorb longwave radiant energy emitted by the earth, which warms the atmosphere. The GHGs also emit longwave radiation both upward to space and back down toward the surface of the earth. The downward part of this longwave radiation emitted by the atmosphere is known as the "greenhouse effect."

The current scientific consensus is that the majority of the observed warming over the last 50 years can be attributable to increased concentration of GHG emissions in the atmosphere due to human activities. Events and activities, such as the industrial revolution and the increased consumption of fossil fuels (e.g., combustion of gasoline, diesel, coal, etc.), have heavily contributed to the increase in atmospheric levels of GHG emissions. As reported by the California Energy Commission (CEC), California contributes 1.4 percent of the global and 6.2

⁶ Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, Office of Environmental Health Hazard Assessment, 2015.

percent of the national GHG emissions (CEC, 2004). Further, approximately 80 percent of GHG emissions in California are from fossil fuel combustion (e.g., gasoline, diesel, coal, etc.).

GHGs are typically reported as CO₂ equivalent emissions (CO₂e). CO₂e is the amount of CO₂ that would have the same global warming potential (relative measure of how much heat a greenhouse gas traps in the atmosphere) as a given mixture and amount of greenhouse gas. CO₂e is estimated by the summation of mass of each GHG multiplied by its global warming potential (global warming potentials: CO₂ = 1, CH₄ = 21, N₂O = 310, etc.).⁷

Construction

No construction is expected at Quemetco. Exide is expected to construct temporary enclosures. Based on the same assumptions made for the construction criteria pollutant estimates, approximately 4,820 metric tons of CO₂e would be generated from all construction activity. Amortized over 30 years as prescribed by the SCAQMD Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans⁸ adopted by the SCAQMD Governing Board in December 2008, approximately 1 metric tons of CO₂e emissions per year (see Appendix B for calculations) would be generated from construction activities over the life of the project.

Operation

Quemetco

Quemetco is not expected to have any new GHG impacts for PAR 1420.1 compliance. Any emissions from Quemetco during closure (Quemetco currently has no foreseeable plan to close) would likely be no greater than those occurring at Exide and would also not occur in the same year as Exide's closure. Therefore, any GHG impact from Quemetco would be less than analyzed for Exide.

Exide

The operation of the negative air pressure systems, enhanced measures during maintenance activities and housekeeping, and wheel washer are not expected to generate greenhouse gases as the equipment control emissions has no secondary emissions impacts. However, the operation of the street sweeper, water tank truck, worker vehicles, and haul/delivery trucks may result in the generation of 2,672.5 metric tons of CO₂e operational emissions per year. The addition of 2,673.5 metric tons of CO₂e emissions from construction and operation are less than the SCAQMD significance threshold of 10,000 metric tons per year for CO₂e from industrial projects.

Therefore, PAR 1420.1 is not expected to generate GHG emission, either directly or indirectly, that may have a significant impact on the environment no conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG gases.

Conclusion

Based upon these considerations, the proposed project would not generate significant adverse construction or operational air quality impacts and, therefore, no further analysis is required or necessary and no mitigation measures are necessary or required.

⁷ California Air Resource Board Conversion Table: <http://www.arb.ca.gov/cc/facts/conversiontable.pdf>

⁸ SCAQMD Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>

IV. BIOLOGICAL RESOURCES.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Impacts on biological resources will be considered significant if any of the following criteria apply:

- The project results in a loss of plant communities or animal habitat considered to be rare, threatened or endangered by federal, state or local agencies.
- The project interferes substantially with the movement of any resident or migratory wildlife species.
- The project adversely affects aquatic communities through construction or operation of the project.

Discussion

IV. a), b), c), d), e) & f) In general, the affected facilities and the surrounding industrial areas currently do not support riparian habitat, federally protected wetlands, or migratory corridors because they are long developed and established foundations used for industrial purposes. Additionally, special status plants, animals, or natural communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service are not expected to be found in close proximity to the affected facility. Therefore, the proposed project would have no direct or indirect impacts that could adversely affect plant or animal species or the habitats on which they rely in the SCAQMD's jurisdiction.

Compliance with PAR 1420.1 is expected to reduce lead emissions from operations at the affected facility, which would improve, not worsen, present conditions of plant and animal life, since these TAC emissions would be captured destroyed or disposed of properly before they impact plant and animal life. PAR 1420.1 does not require acquisition of additional land or further conversions of riparian habitats or sensitive natural communities where endangered or sensitive species may be found.

The proposed project is not envisioned to conflict with local policies or ordinances protecting biological resources or local, regional, or state conservation plans because it is only expected to affect existing large lead-acid battery recycling facilities located in an industrial area. PAR 1420.1 is designed to lead emissions which would also reduce emissions both inside and outside the boundaries of the affected facilities and, therefore, more closely in line with protecting biological resources. Land use and other planning considerations are determined by local governments and no land use or planning requirements would be altered by the proposed project. Additionally, the proposed project would not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other relevant habitat conservation plan, and would not create divisions in any existing communities because all activities associated with complying with PAR 1420.1 would occur at existing established industrial facilities.

The SCAQMD, as the Lead Agency for the proposed project, has found that, when considering the record as a whole, there is no evidence that the proposed project will have potential for any new adverse effects on wildlife resources or the habitat upon which wildlife depends because all activities needed to comply with PAR 1420.1 would take place at long developed and established facilities. Accordingly, based upon the preceding information, the SCAQMD has, on the basis of substantial evidence, rebutted the presumption of adverse effect contained in §753.5 (d), Title 14 of the California Code of Regulations. Further, in accordance with this conclusion, the SCAQMD believes that this proposed project qualifies for the no effect determination pursuant to Fish and Game Code §711.4 (c).

Based upon these considerations, significant adverse biological resources impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

V. CULTURAL RESOURCES.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource, site, or feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Impacts to cultural resources will be considered significant if:

- The project results in the disturbance of a significant prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group.
- Unique paleontological resources are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

Discussion

V. a), b), c), & d) The existing large lead-acid battery recycling facilities are located in areas zoned as industrial, which have already been greatly disturbed. Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers. Therefore, the proposed project has no potential to

cause a substantial adverse change to a historical or archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains, including those interred outside formal cemeteries.

Based on the above discussion, the proposed project is not expected to create any significant adverse effect to a historical resource as defined in §15064.5; cause a new significance impact to an archaeological resource as defined in §15064.5; directly or indirectly destroy a unique paleontological resource, site, or feature; or disturb any human including those interred outside formal cemeteries.

V. e) PAR 1420.1 is not expected to require physical changes to a site, feature, place, cultural landscape, sacred place or object with cultural value to a California Native American Tribe. Furthermore, the proposed project is not expected to result in a physical change to a resource determined to be eligible for inclusion or listed in the California Register of Historical Resources or included in a local register of historical resources. For these reasons, the proposed project is not expected to cause any substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074.

It is important to note that as part of releasing this CEQA document for public review and comment, the SCAQMD also provided a formal notice of the proposed project to all California Native American Tribes (Tribes) that requested to be on the Native American Heritage Commission’s (NAHC) notification list per Public Resources Code §21080.3.1 (b)(1). The NAHC notification list provides a 30-day period during which a Tribe may respond to the formal notice, in writing, requesting consultation on the proposed project.

In the event that a Tribe submits a written request for consultation during this 30-day period, the SCAQMD will initiate a consultation with the Tribe within 30 days of receiving the request in accordance with Public Resources Code §21080.3.1 (b). Consultation ends when either: 1) both parties agree to measures to avoid or mitigate a significant effect on a Tribal Cultural Resource and agreed upon mitigation measures shall be recommended for inclusion in the environmental document [see Public Resources Code §21082.3 (a)]; or, 2) either party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached [see Public Resources Code §21080.3.2 (b)(1)-(2) and §21080.3.1 (b)(1)].

Based upon these considerations, significant adverse cultural resources impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

VI. ENERGY.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with adopted energy conservation plans?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the need for new or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	substantially altered power or natural gas utility systems?				
c)	Create any significant effects on local or regional energy supplies and on requirements for additional energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Create any significant effects on peak and base period demands for electricity and other forms of energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Comply with existing energy standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Impacts to energy and mineral resources will be considered significant if any of the following criteria are met:

- The project conflicts with adopted energy conservation plans or standards.
- The project results in substantial depletion of existing energy resource supplies.
- An increase in demand for utilities impacts the current capacities of the electric and natural gas utilities.
- The project uses non-renewable resources in a wasteful and/or inefficient manner.

Discussion

VI. a) & e) PAR 1420.1 does not require any action which would result in any conflict with an adopted energy conservation plan or violation of any energy conservation standard. PAR 1420.1 is not expected to conflict with adopted energy conservation plans because existing facilities would be expected to continue implementing any existing energy conservation plans.

PAR 1420.1 is not expected to cause new development. The local jurisdiction or energy utility sets standards (including energy conservation) and zoning guidelines regarding new development and will approve or deny applications for building new equipment at the affected facility. During the local land use permit process, the project proponent may be required by the local jurisdiction or energy utility to undertake a site-specific CEQA analysis to determine the impacts, if any, associated with the siting and construction of new development.

As a result, PAR 1420.1 would not conflict with energy conservation plans, use non-renewable resources in a wasteful manner, or result in the need for new or substantially altered power or natural gas systems.

VI. b), c) & d.

Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers.

Electricity Impacts

Quemetco

No new energy impacts are expected at Quemetco’s facility during its normal operation. If Quemetco closes (it currently has no foreseeable plan to do so), its energy impacts are not anticipated to be any higher than analyzed for Exide below.

Exide

During facility closure, compliance with PAR 1420.1 may cause an increase in electricity consumption associated with the continued operation of existing ambient monitoring equipment, housekeeping and maintenance requirements, including the negative air pressure enclosures. Gasoline fuel would be consumed by the vehicles needed for ambient air monitoring sampling, the additional workers should a compliance plan be triggered and haul/delivery truck trips during closure. The following sections evaluate the various forms of energy sources affected by the proposed project.

The five existing air monitors are expected to be electric powered. Air monitors are expected to be powered by electricity service near where the air monitors are placed. An air monitor typically requires 16 amps of service (six amps for the monitor and 10 amps for vacuum pumps), for a total of 211.2 kW -h (5 monitors x 16 amps x 110 voltage x 24 hr)⁹.

The California Energy Commission (CEC) latest report showed that Los Angeles Department of Water and Power (LADWP) consumed 25,921 gigawatts (GW) in 2008 with a peak consumption of 5,717 megawatts per hour (MWh) in 2008. The power required to run PAR 1420.1 energy needs at Exide would be 0.00007 % of the 2008 consumption and 3.6 % of the peak consumption. Therefore, SCAQMD staff concludes that the amount of electricity required to meet the incremental energy demand associated with PAR 1420.1 would be sufficient and would not result in a significant adverse electricity energy impact. (See Table 2-7 and Table 2-8 for details.)

Table 2-7: PAR 1420.1 Additional Electricity Consumption

Energy Use	Consumption (kW-h)
Blowers for APCD and negative air pressure (100 bhp) @ 1788 kW-h x 10	17,880
Air Monitors (5 monitors, 24 hrs/day)	211.2
Total	18,091

Table 2-8 Electricity Use from PAR 1420.1 Compliance

Area	Electricity Use, kW/hr	Electricity Use, MW/year	Area Consumption, GW-H	Area Consumption %	Area Peak Consumption MW-hr	Area Peak Consumption%
LADWP	18,091	158,477	25,921	7.0E-05	5,717	3.6

Natural Gas Impacts

No new natural gas impacts are expected.

⁹ Power = (A x V)/1000= (16 amps x 110 voltage)/1000= 1.76 kW x 24 hr = 42.24 kW-hr per monitor.

Diesel Impacts

Construction Diesel Use

No construction is expected at Quemetco. Exide will need to construct temporary enclosures. See Table 2-9 and Appendix B for details.

Operational Diesel Use

No new diesel use is expected at Quemetco for PAR 1420.1 compliance.

Exide

Diesel Use

A maximum of two truck trips per day to deliver filters and dispose of additional hazardous material. These trucks would use 24 gallons (40+200 miles ÷ 10 mpg) per event. By assuming two truck trips per week, there will be 104 trucks/yr. The year's total of diesel use will be 1,248 gal/yr.

Sweeper Diesel Use

Exide is expected to continue their diesel vehicle sweeping. Diesel use was estimated for the three sweeping events at the affected facility. Diesel use was estimated assuming that sweepers would be nine feet wide, sweep over the entire outside area around the production site (i.e., not around administrative buildings) three times a day with two feet of overlap on the return path as the sweepers travel back and forth. Assuming a ten mile per gallon of diesel fuel efficiency approximately 0.84 gallons of diesel would be consumed on a peak day and 307 gal/yr.

Aerial Lift Diesel Use

PAR 1420.1 requires roof washings or vacuuming on either a quarterly or semi-annual basis. The facilities would need to use aerial lifts to reach the roofs. Therefore, only one additional aerial lift diesel-fueled use is expected on any given day. For this analysis, the aerial lifts would be used six hours per day. Diesel fuel use was estimated using a 1.4 gallon per hour fuel consumption from ARB's OFFROAD2007 database. The diesel fuel use from aerial lifts would be 8.4 gallons per day. On a yearly basis, worse-case would be quarterly cleanings facilities would consume 34 gal/yr (8.4 gal/day*4 day/yr).

Roof cleaning may be contracted out, so it is assumed that aerial lifts are delivered. A single heavy-duty diesel truck round trip of 40 miles per day is expected to be required on a peak day. Assuming a ten mile per gallon of diesel fuel efficiency approximately 8 gallons of diesel would be consumed on a peak day. On a yearly basis, worse-case for quarterly deliveries would consume 416 gal/yr (8 gal/day*4 day/yr*13 facilities).

Gasoline Use

Construction Gasoline Use

No construction is expected at Quemetco. Exide will need to construct temporary enclosures. See Table 2-9 and Appendix B for details.

Operational Gasoline Use

No new gasoline usage is expected at Quemetco for PAR 1420.1 compliance.

Exide

Air Monitoring

One trip per day to visit air monitors, based on average of 80 miles round trip and a 16 mile per gallon fuel efficiency, would consume approximately 5 gallons of gasoline on a peak day; annually would use 1,300 gal/yr (5 gal/day x 5 days/week x 52 weeks).

Worker Trips

Additional worker trips may be associated with additional enhanced maintenance activities and housekeeping provisions. It was assumed that 4 additional workers would be required to do the enhanced housekeeping measures (4 additional gasoline-fueled vehicle trips). Assuming a 20 mile round trip, and a 10 mile per gallon fuel efficiency, approximately 8 gallons of gasoline would be used by the additional workers' vehicle trips per day and 2,920 gal/yr .

The 2012 AQMP states that 524 million gallons of diesel and 5,589 million gallons gasoline are consumed per year in Los Angeles County. An additional 1,589 gallons of diesel consumed and 1,308 gallons of gasoline consumed per year of operation is not expected to have a significant adverse impact on fuel supplies. Table 2-9 provides a summary of all the fuel usage impacts.

Table 2-9 Annual Total Projected Fuel Usage for Operational Activities

Type of Equipment	Diesel	Gasoline
	(gal/yr)	(gal/yr)
Construction Phase	1,915.36	320
Delivery/Haul Trucks	1,248	N/A
Sweeper Vehicles	307	N/A
Aerial Lifts	34	N/A
Air Monitoring Vehicle	N/A	1,300
Worker Trips	N/A	2920
Total:	3,504	4,540
Year 2012 Projected Basin Fuel Demand (gal/yr)^a	524,000,000	5,589,000,000
Total % Above Baseline	0.00066877	8.1231E-05
Exceed Significance?	No	No

^a Figures taken from Table 3.3-3 of the 2012 AQMP Final EIR

Based upon these considerations, significant adverse energy impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

VII. GEOLOGY AND SOILS.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Impacts on the geological environment will be considered significant if any of the following criteria apply:

- Topographic alterations would result in significant changes, disruptions, displacement, excavation, compaction or over covering of large amounts of soil.

- Unique geological resources (paleontological resources or unique outcrops) are present that could be disturbed by the construction of the proposed project.
- Exposure of people or structures to major geologic hazards such as earthquake surface rupture, ground shaking, liquefaction or landslides.
- Secondary seismic effects could occur which could damage facility structures, e.g., liquefaction.
- Other geological hazards exist which could adversely affect the facility, e.g., landslides, mudslides.

Discussion

VII. a) Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers.

Because Southern California is an area of known seismic activity, existing facilities are expected to conform to the Uniform Building Code and all other applicable state and local building codes. As part of the issuance of building permits, local jurisdictions are responsible for assuring that the Uniform Building Code is adhered to and can conduct inspections to ensure compliance. The Uniform Building Code is considered to be a standard safeguard against major structural failures and loss of life. The basic formulas used for the Uniform Building Code seismic design require determination of the seismic zone and site coefficient, which represents the foundation condition at the site.

During closure, it is expected that the existing total enclosures would be maintained and operational until the entire closure is ready to be demolished. The existing enclosures would have followed the Uniform Building Code's seismic requirements and PAR 1420.1 is not expected to increase exposure to existing earthquake risk.

VII. b) No construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures. Therefore, no significant soil erosion or significant loss of topsoil, significant unstable earth conditions or significant changes in geologic substructures are expected to occur at the affected facility as a result of implementing the proposed project.

VII. c) Since the proposed project would affect existing facilities whose soil has already been disturbed, it is expected that the soil types present at the affected facility would not be further susceptible to expansion or liquefaction other than is already existing. Furthermore, subsidence and liquefaction is not anticipated to be a problem since any excavation, grading, or filling activities are expected to follow the Uniform Building Code. Additionally, the affected areas are not envisioned to be prone to landslides, instability, or have unique geologic features since the affected existing facility is located in industrial areas in a flat area.

VII. d) & e) Since PAR 1420.1 would affect soils at an existing established facility located in a highly developed industrial zone, it is expected that people or property would not be exposed to expansive soils or soils incapable of supporting water disposal. Both affected facilities have existing wastewater treatment systems that would continue to be used even in facility closure, and these systems are expected to have the capacity to support the closure requirements of PAR 1420.1. Sewer systems are available to handle wastewater produced and treated by the affected facilities. Therefore, PAR 1420.1 would not require the installation of new septic tanks or alternative wastewater disposal systems at the affected facility. As a result, PAR 1420.1 would not require operators to utilize septic systems or alternative wastewater disposal systems. Thus, the proposed project would not adversely affect soils normally associated with a septic system or alternative wastewater disposal system.

Based upon these considerations, significant adverse geology and soil impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

VIII. HAZARDS AND HAZARDOUS MATERIALS.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 use airport or a private	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- airstrip, would the project result in a safety hazard for people residing or working in the project area?
- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- g) 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?
- h) Significantly increased fire hazard in areas with flammable materials?

Significance Criteria

Impacts associated with hazards will be considered significant if any of the following occur:

- Non-compliance with any applicable design code or regulation.
- Non-conformance to National Fire Protection Association standards.
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG) 2 levels.

Discussion

VIII. a) & b) PAR 1420.1 is expected to reduce the amount of lead being emitted into the air. With respect to the closure provisions, PAR 1420.1 requires Exide to continue monitoring, housekeeping and maintenance activities. These requirements are expected to control and reduce fugitives such that the rule is not expected to create impacts in connection with the handling of hazardous wastes. In addition, PAR 1420.1 specifically requires that a facility cease all closure activities if there is an exceedance of an arsenic or lead ambient concentration limit.

The stop work provisions of the rule are also not expected to have any significant impacts. These provisions are specifically designed to reduce the release of fugitive emissions. Although the provisions may have an impact on the schedule set forth in the DTSC/Exide Closure Plan, DTSC has advised that modifications to the closure plan are anticipated, but the environmental impacts from those modifications would be less than what is analyzed within this ~~Draft~~ Final SEA and/or DTSC’s CEQA document; and DTSC expects and supports a stopping of closure activities if ambient exceedances are occurring. These facts further support a finding of less than significant impacts.

Spent lead is already transported for treatment offsite and out of the Basin. Therefore, no new significant hazards are expected to the public or environment through its routine transport, use and disposal.

Lead in water is not considered volatile. The wastewater systems require secondary containment in the case of an upset to prevent the release of the lead containing water. Therefore, compliance with PAR 1420.1 is not expected to create a significant hazard to the public or environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment

Therefore, PAR 1420.1 is not expected to create a significant hazard to the public or environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment.

VIII. c) No schools are located within a quarter mile of Quemetco and Exide. Therefore, PAR 1420.1 would not result in hazardous emissions, handling of hazardous or acutely hazardous materials, substances or wastes within one-quarter mile of an existing or proposed school.

VIII. d) Government Code §65962.5 refers to hazardous waste handling practices at facilities subject to the Resources Conservation and Recovery Act (RCRA). Both PAR 1420.1 affected facilities are on the Cortese List as presented in the ENVIROSTOR¹⁰ database.

Since no earth moving or grading is expected at either Quemetco or Exide, no additional hazards from soil disturbances are expected.

During closure, PAR 1420.1 requires Exide to continue the ambient monitoring, housekeeping and maintenance provisions in the rule, which includes the operation of total enclosures under negative air pressure until the building is demolished. Compliance with PAR 1420.1 will reduce the emissions of potentially toxic fugitive dust from the facility during closure.

In addition, hazardous waste is expected to be disposed properly offsite so the proposed project would not increase a hazard at the affected site or the public and environment offsite. Hazardous wastes from Exide are required to be managed in accordance with applicable federal, state, and local rules and regulations. Accordingly, significant hazards impacts from the disposal/recycling of hazardous materials are not expected from the implementation of PAR 1420.1.

VIII. e) Exide is not near any airports or private airstrips. Quemetco is within six miles of the El Monte Airport. PAR 1420.1 would result in the reduction of lead emissions during operation and facility closure. Secondary TAC emissions from the proposed project were addressed in the Air Quality section of this ~~Draft~~ Final SEA and found to be less than significant. Therefore, no new hazards are expected to be introduced at the affected facility that could create safety hazards at local airports or private airstrips. Therefore, PAR 1420.1 is not expected to result in a safety hazard for people residing or working in the project area even within the vicinity of an airport.

VIII. f) Emergency response plans are typically prepared in coordination with the local city or county emergency plans to ensure the safety of the public (surrounding local communities), and the facility employees as well. The proposed project would not impair implementation of, or physically interfere with any adopted emergency response plan or emergency evacuation plan. The existing affected facility already has an emergency response plan in place. The addition of air pollution control equipment and possible replacement of the storm water retention pond with

¹⁰ <http://www.envirostor.dtsc.ca.gov>

storage tanks is not expected to require modification of the existing emergency response plan at the affected facility. Thus, PAR 1420.1 is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

VIII. g) The proposed project affects facilities located in highly developed areas and are not adjacent to wildland, so potential for a wildland fire from the proposed project does not exist.

VIII. h) The Uniform Fire Code and Uniform Building Code set standards intended to minimize risks from flammable or otherwise hazardous materials. Local jurisdictions are required to adopt the uniform codes or comparable regulations. Local fire agencies require permits for the use or storage of hazardous materials and permit modifications for proposed increases in their use. Permit conditions depend on the type and quantity of the hazardous materials at the facility. Permit conditions may include, but are not limited to, specifications for sprinkler systems, electrical systems, ventilation, and containment. The fire departments make annual business inspections to ensure compliance with permit conditions and other appropriate regulations. Further, businesses are required to report increases in the storage or use of flammable and otherwise hazardous materials to local fire departments. Local fire departments ensure that adequate permit conditions are in place to protect against potential risk of upset. The proposed project would not change the existing requirements and permit conditions.

The proposed project would also not increase the existing risk of fire hazards in areas with flammable brush, grass, or trees. No substantial or native vegetation typically exists on or near the affected facilities (specifically because such areas could allow the accumulation of fugitive lead dust), the existing rule requires the encapsulating (paving or asphaltting) of all facility grounds. So the proposed project is not expected to expose people or structures to wild fires. Therefore, no significant increase in fire hazards is expected at the affected facilities associated with the proposed project.

Based upon these considerations, significant adverse hazards and hazardous materials impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

IX. HYDROLOGY AND WATER QUALITY.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards, waste discharge requirements, exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, or otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project: 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 which would not support existing land uses or planned uses for which permits have been granted)?				
c) Substantially alter the existing drainage pattern of the site or area, including through 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 substantial erosion or siltation on- or off-site or flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Place housing or other structures 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, which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) 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, or inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Require or result in the construction of new water or wastewater treatment facilities or new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project: effects?				
h) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance Criteria

Potential impacts on water resources will be considered significant if any of the following criteria apply:

Water Demand:

- The existing water supply does not have the capacity to meet the increased demands of the project, or the project would use more than 262,820 gallons per day of potable water.
- The project increases demand for total water by more than five million gallons per day.

Water Quality:

- The project will cause degradation or depletion of ground water resources substantially affecting current or future uses.
- The project will cause the degradation of surface water substantially affecting current or future uses.
- The project will result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.
- The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system are not sufficient to meet the needs of the project.
- The project results in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The project results in alterations to the course or flow of floodwaters.

Discussion

The two existing affected facilities have on-site wastewater treatment operations. For Exide, during closure, they plan on using their existing wastewater treatment or have a portable wastewater treatment system to comply with the publicly owned treatment works (POTW) permits. Exide is also in the process of reevaluating their POTW permits. The wastewater systems at both facilities treat process water and storm water before it is discharged to the POTWs. The discharged water must comply with existing lead water quality standards.

No construction is foreseeable at Quemetco and Exide will require construction of temporary enclosures including scaffolding and plastic sheeting. However, Exide would have water impacts from PAR 1420.1's maintenance activities and housekeeping measures. The following sections discuss the water impacts in detail.

IX. a) PAR 1420.1 would not alter any existing wastewater treatment requirements of the Los Angeles County Sanitation District (LACSD) and Regional Water Quality Control Board or otherwise substantially degrade water quality that the requirements are meant to protect the environment. Although the amount of water used by Exide may increase, all of the storm water and wastewater from the facility would still be required to be treated by the onsite wastewater treatment.

Discharge concentrations are currently and would continue to be limited by the Industrial Wastewater Discharge Permit.¹¹ Exide's Hazardous Waste Facility Permit states that any wastewater that does not meet the discharge concentrations set by the LACSD would have to be cycled through the treatment plant until the discharge criteria is met or discharged as hazardous waste.¹² Since wastewater from the facility is treated in an on-site wastewater treatment facility, heavily regulated, and enforced, no change in the water quality of the discharge is expected.

IX. b) PAR 1420.1 would not require the use of groundwater. The facilities use potable water that is treated in their respective on-site wastewater treatment, reused, and then directed to the sanitary sewer. Therefore, it would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

IX. c) & d) No physical changes are expected at either facility in order to comply with PAR 1420.1 which will alter the existing drainage pattern, storm water collection or wastewater treatment of either facility.

Therefore, PAR 1420.1 is a project that is not expected to have significant adverse effects on any existing drainage patterns, or cause an increase rate or amount of surface runoff water that would exceed the capacity of the facilities' existing or planned storm water drainage systems.

IX. e) & f) PAR 1420.1 does not include or require any new or additional construction activities to build additional housing that could be located in 100-year flood hazard areas. Hence, PAR 1420.1 is not expected to result in placing housing in 100-year flood hazard areas that could create new flood hazards. Therefore, PAR 1420.1 is not expected to generate significant impacts regarding placing housing in a 100-year flood zone.

For the same reasons as those identified in the preceding paragraph, PAR 1420.1 is not expected to create significant adverse impacts from flooding as a result of failure of a levee or dam or inundation by seiches, tsunamis, or mudflows because the proposed project does not require levee or dam construction, and the affected facilities are located on flat land far from the ocean.

IX. g) The proposed project is not expected to generate significant water use or wastewater generation (see IX. h). PAR 1420.1 will not significantly affect the facilities' water and

¹¹ According to Los Angeles County Sanitation District- (June 28, 2013).

¹² Exide Technologies, Hazardous Waste Facility Permit, Attachment "A", 2006, www.dtsc.ca.gov/HazardousWaste/Projects/upload/Exide_dPermit.pdf

wastewater generation. Therefore, no additional water or waste water treatment facilities are expected nor any planned expansion of the facilities' existing on-site wastewater treatment system.

Exide

During closure, Exide is expected to continue operation of the on-site WWTP until such time that the WWTP is not needed. Furthermore, as part of the closure process, Exide will be applying for a NPDES general construction permit. Therefore, based on the analysis in this environmental checklist, PAR 1420.1 is not expected to result in the construction of new water or waste water treatment facilities, new storm water drainage facilities, expansion of existing facilities, or construction of which could cause significant environmental effects. Therefore, no further analysis or mitigation measures are required or necessary.

IX. h)

Construction Impacts

No construction is expected at Quemetco. Exide will need to construct temporary enclosures. See Table 2-9 and Appendix B for details.

Operational Impacts

No new operational impacts are expected for Quemetco.

Exide is also expected to use additional water for the wheel washer station and housekeeping related activities. The wheel washer is expected to use 24 gallons of water per vehicle and a maximum of 30 vehicles per day. The total daily water consumption from the wheel washer station would be 720 gal/day. Currently, Exide fills their one water tank truck approximately 15 times per day, which has a capacity of 3,000 gallons. This equates to 45,000 gal/day of water per day during housekeeping operations¹³. Staff estimates that the housekeeping water usages for PAR 1420.1 compliance will continue. This activity is conservatively added to the project's total water use, however it is already part of the existing setting.

Exide may need a maintenance team to minimize their fugitive dust for the enhanced housekeeping and maintenance requirements. The maintenance team will use water hoses to water down the dust from these activities. SCAQMD staff estimates these activities will result in 200 gal/day.

Table 2-10: PAR 1420.1 Additional Water Consumption

Water Application	Additional Water Usage (gal/day)
Enhanced Maintenance Activities	200
Wheel Washer Station	720
Enhanced Housekeeping Measures	45,000
Total	45,920
Significance Threshold	262,820
Exceed Significance Threshold?	No

¹³ Housekeeping operations include street sweeping, watering, and washing the facility.

Therefore, the total additional use would be 45,920 gal/day of water, which is less than the significance threshold of 262,820 gal/day of potable water and total water demand of more than five million gallons per day (see Table 2-10: PAR 1420.1 Additional Water). Therefore, sufficient water supplies are expected to be available to serve the project from existing entitlements and resources without the need for new or expanded entitlements. Therefore, PAR 1420.1 is not expected to be significant for operational water demand.

Thus, the impacts to water are based on a worst case daily water demand from the operational phase of the project.

IX. i)

Quemetco

No impacts are expected for Quemetco's sewer system.

Exide

No significant impacts are expected for Exide's sewer system.

Exide will continue to operate their WWT system during closure. Once the WWT system has been dismantled, Exide plans on having a temporary portable WWT system to comply with their wastewater discharge permits.

Exide has an Industrial Wastewater Discharge Permit with a maximum 310,000 gal/day limit. The daily wastewater peak discharge rate for the fiscal year 2011/2012 was 132,630 gal/day based on the annual surcharge statement submitted by the company. Their permitted maximum peak discharge limit is 300 gpm. They had a peak discharge rate¹⁴ of 236 gpm.

An increase of 32 gpm of discharged wastewater would increase their total peak discharge rate to 268 gpm of wastewater (32 gpm + 236 gpm), which would be less than the maximum permitted wastewater discharge rate of 300 gpm for the existing wastewater system. The additional 43,200 gal/day of discharged wastewater would result in an average facility wastewater discharge rate of 175,830 gal/day, which would be less than the permit maximum wastewater discharge rate of 310,000 gal/day, so no change to current permit is required.

If the proposed project does trigger a wastewater discharge rate that exceeds the 310,000 gal/day limit, the LACSD deems that a secondary peak permit could be required to allow the discharge during non-peak hours. Significance thresholds for industrial wastewater discharge is determined by its impact to the affected sewer system. The LACSD provided that there is not any hydraulic overloading of the sewer system downstream of the Exide facility. However, wastewater flow can also affect relief or repair work, but no relief or repair work in the near future was identified by the LACSD. Based on the existing sewer system used by Exide, the LACSD believes that an additional 30 gpm can be accommodated by the existing sewer system.

Therefore, based on the above analysis, there would be adequate capacity to serve the proposed project's projected demand addition to the provider's existing commitments.

¹⁴ A peak discharge rate is based on the average of the ten highest 30-minute peak flow periods.

Based upon these considerations, significant adverse hydrology and water quality impacts are not anticipated and, therefore, no further analysis is required or necessary.

X. LAND USE AND PLANNING.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Land use and planning impacts will be considered significant if the project conflicts with the land use and zoning designations established by local jurisdictions.

Discussion

X. a) Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures.

During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers. Therefore, the proposed project would not create divisions in any existing communities.

X. b) Land use and other planning considerations are determined by local governments. Construction and operation of a new temporary enclosure during closure of the Exide facility would occur within the boundaries of an existing large lead recycling facility, which is in an area that is zoned for industrial use. The new PAR 1420.1 requirements are not designed to impede or conflict with existing land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, but to assist in avoiding or mitigating lead emissions impacts from large lead recycling facilities. Operations at both affected facilities would still be expected to comply, and not interfere, with any applicable land use plans, zoning ordinances.

Based upon these considerations, significant adverse land use and planning impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

XI. MINERAL RESOURCES.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Project-related impacts on mineral resources will be considered significant if any of the following conditions are met:

- The project 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.
- The proposed project results 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.

Discussion

XI. a) & b) There are no provisions in PAR 1420.1 that would result in the loss of availability of a known mineral resource of value to the region and the residents of the state such as aggregate, coal, clay, shale, et cetera, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Based upon these considerations, significant adverse mineral resources are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

XII. NOISE.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project result in:				
a) Exposure of persons to or generation of permanent noise levels in excess of	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	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 use airport or private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Impacts on noise will be considered significant if:

- Construction noise levels exceed the local noise ordinances or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three decibels (dBA) at the site boundary. Construction noise levels will be considered significant if they exceed federal Occupational Safety and Health Administration (OSHA) noise standards for workers.
- The proposed project operational noise levels exceed any of the local noise ordinances at the site boundary or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three dBA at the site boundary.

Discussion

XI. a), b) & c) Noise is usually defined as sound that is undesirable because it interferes with speech communication and hearing, is intense enough to damage hearing, or is otherwise annoying (unwanted noise). Sound levels are measured on a logarithmic scale in decibels (dB). The universal measure for environmental sound is the "A" weighted sound level (dBA), which is the sound pressure level in decibels as measured on a sound level meter using the A-weighted filter network. "A" scale weighting is a set of mathematical factors applied by the measuring instrument to shape the frequency content of the sound in a manner similar to the way the human ear responds to sounds.

Federal, state and local agencies regulate environmental and occupational, as well as, other aspects of noise. Federal and state agencies generally set noise standards for mobile sources, while regulation of stationary sources is left to local agencies. Local regulation of noise involves implementation of General Plan policies and Noise Ordinance standards, which are general principles, intended to guide and influence development plans. Noise Ordinances set forth specific standards and procedures for addressing particular noise sources and activities. The Occupational Safety and Health Administration (OSHA) sets and enforces noise standards for worker safety.

Groundborne vibration is quantified in terms of decibels, since that scale compresses the range of numbers required to describe the oscillations. The Federal Transit Administration uses vibration decibels (abbreviated as VdB) to measure and assess vibration amplitude. Vibration is referenced to one micro-inch/sec (converted to 25.4 micro-mm/sec in the metric system) and presented in units of VdB.

Based on existing lead point source tests, Quemetco is already complying with PAR 1420.1's total facility point source limit (0.003 lb/hr) for lead. There will be no physical changes at Quemetco. Additionally, Exide is in the process of closing their facility. In order for Exide to comply with PAR 1420.1 during closure, Exide will likely continue the current monitoring, housekeeping and maintenance activities, as well as maintain the existing total enclosures on-site and construct temporary enclosures made of scaffolding and plastic sheeting during decontamination and deconstruction. No significant noise or vibration generating activities are anticipated during this relatively minor construction activity that would be any greater than occurs in the baseline activity onsite. Therefore, PAR 1420.1 will not result in significant noise or vibration impacts from construction.

Both facilities are located in areas which are industrial in nature. During closure, the noise generated by continuing the ambient monitoring, housekeeping and maintenance requirements, and operating the total enclosure under negative air pressure is negligible when compared to the noise generated by the demolition activities. Therefore, noise and vibration impacts are considered less than significant.

XI. d) The affected facility is not near any airports or private airstrips. The closest airport or airstrip is the Hawthorne Municipal Airport, which is 9.6 miles from the affected facility. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels within two miles of a public use airport or private airstrip.

Based upon these considerations, significant adverse noise impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

XIII. POPULATION AND HOUSING.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Impacts of the proposed project on population and housing will be considered significant if the following criteria are exceeded:

- The demand for temporary or permanent housing exceeds the existing supply.
- The proposed project produces additional population, housing or employment inconsistent with adopted plans either in terms of overall amount or location.

Discussion

XIII. a) Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will likely continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for an additional 8 workers. The proposed project is not anticipated to generate any significant effects, either direct or indirect, on the district's population or population distribution. Human population within the jurisdiction of the SCAQMD is anticipated to grow regardless of implementing PAR 1420.1. It is expected that the additional 8 workers needed for the compliance plan would be from the local labor pool in Southern California. As such, PAR 1420.1 would not result in changes in population densities or induce significant growth in population.

XIII. b) Since PAR 1420.1 affects two existing facilities, it is 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 elsewhere.

Based upon these considerations, significant adverse population and housing impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

XIV. PUBLIC SERVICES.

Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government 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:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- | | | | | |
|-----------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Significance Criteria

Impacts on public services will be considered significant if the project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives.

Discussion

XIV. a) & b) PAR 1420.1 would not involve the use of new flammable or combustible materials. As a result, no new fire hazards or increased use of hazardous materials would be introduced at the affected facilities that would require additional emergency responders such as police or fire departments or additional demand from these resources. Thus, no new demands for fire or police protection are expected from PAR 1420.1.

XIV. c) As noted in the “Population and Housing” discussion, implementation of the proposed project would not have a significant impact on inducing growth. The additional workers needed for the compliance plan would come from the local labor pool in southern California. As a result, PAR 1420.1 would have no direct or indirect effects on population growth in the district. Therefore, there would be no increase in local population and thus no impacts are expected to local schools as a result of PAR 1420.1.

XIV. d) Because the proposed project involves requirements that are similar to existing operations already in place at an existing facility and the facilities are already heavily regulated, PAR 1420.1 is not expected to require the need for additional government services. Enforcement of PAR 1420.1 is expected to be performed by the existing SCAQMD inspectors for these facilities. Further, the proposed project 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 will be no increase in population and, therefore, no need for physically altered government facilities.

Based upon these considerations, significant adverse public services impacts are not anticipated and, therefore, no further analysis is required or necessary.

XV. RECREATION.

- | | Potentially Significant Impact | Less Than Significant With Mitigation | Less Than Significant Impact | No Impact |
|--|---------------------------------------|--|-------------------------------------|-------------------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- such that substantial physical deterioration of the facility would occur or be accelerated?
- 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 or recreational services?

Significance Criteria

Impacts to recreation will be considered significant if:

- The project results in an increased demand for neighborhood or regional parks or other recreational facilities.
- The project adversely affects existing recreational opportunities.

Discussion

XV. a) & b) As previously discussed under “Land Use,” there are no provisions in PAR 1420.1 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 would be altered by the proposed project. Further, implementation of PAR 1420.1 would not increase the use of existing neighborhood and regional parks or other recreational facilities or include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment because the proposed project is not expected to induce population growth.

Based upon the above considerations, significant adverse recreation impacts are not anticipated and, therefore, no further analysis is required or necessary.

XVI. SOLID/HAZARDOUS WASTE.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance Criteria

The proposed project impacts on solid/hazardous waste will be considered significant if the following occurs:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.

Discussion

XVI.a) Landfills are permitted by the local enforcement agencies with concurrence from the California Department of Resources Recycling and Recovery (CalRecycle). Local agencies establish the maximum amount of solid waste which can be received by a landfill each day and the operational life of a landfill.

Construction

No construction is expected at Quemetco. Exide is expected to construct temporary enclosures to comply with PAR 1420.1. The plastic sheeting of 1,234 cubic yards would generate 41 disposal trucks during construction. (See Table 2-11 and Appendix B for details).

Operation

Exide

Exide will be operating their APCDs during much of their closure process. Therefore, operation of control equipment such as filters could have solid waste impacts.

This analysis of solid waste impacts assumes that safety and disposal procedures required by various agencies in the state of California will provide reasonable precautions against the improper disposal of hazardous wastes in a municipal waste landfill. Because of state and federal requirements, some facilities are attempting to reduce or minimize the generation of solid and hazardous wastes by incorporating source reduction technologies to reduce the volume or toxicity of wastes generated, including improving operating procedures, using less hazardous or nonhazardous substitute materials, and upgrading or replacing inefficient processes.

Filtration

Filtration includes usage of baghouse, HEPA filters. All mixed metal compounds could be generated with the use of filtration controls at a 99.9 percent control rate.

Currently, the facilities properly send their hazardous materials to their local smelter or to Resource Conservation and Recovery Act (RCRA) landfill. To comply with the proposed rule's requirements, it is conservatively estimated that the operation of the APCDs' filters may generate 3200 cubic yards/yr (4480 tons/yr) of hazardous waste.

The nearest RCRA landfills are the Republic Services and US Ecology. The Republic Services La Paz County Landfill has approximately 20,000,000 cubic yards of capacity remaining for the 50 year life expectancy (400,000 cubic yards per year). The US Ecology, Inc., facility in Beatty, Nevada has approximately 638,858 cubic yards of capacity remaining for the three year life expectancy (212,952 cubic yards per year). US Ecology, Inc., receives approximately 18,000 cubic yards per year of waste, so 194,952 cubic yards per year (212,952 cubic yard/year – 18,000 cubic yard/year) would be available.

With an annual disposal of 4,434 cubic yards of filters, spent lead, metals and plastic sheeting, the total solid/hazardous waste impact from the proposed amended rule are 1.1 percent and 2.27 percent of the available Republic Services and US Ecology landfill capacity, respectively.

The amount of hazardous waste generated by the proposed project will not require new RCRA landfills and is not considered to be a substantial impact to existing landfill capacity. Therefore, potential hazardous waste impacts are not considered significant.

Table 2-11 Total Solid Waste Generation

Waste Type	Potential # APC Devices	Annual Waste per Control Device (cubic yards)	Total Waste Generated (cubic yards/year)
Filtration	5	640	3,200
Plastic Sheeting	--	--	1,234
TOTAL WASTE GENERATED FROM PROPOSED PROJECT			4,434 cubic yards/yr or 12.1 cubic yards/day

Therefore, the increase in hazardous waste disposal from PAR 1420.1 is expected to be less than significant for operational hazardous waste disposal.

XVI.b) The rule amendments are not inconsistent with federal, state and local statutes and regulations related to soil and hazardous waste. It is assumed that facility operators at the affected facilities will comply with all applicable local, state, or federal waste disposal regulations.

Implementing PAR 1420.1 is not expected to interfere with any affected facility’s ability to comply with applicable local, state, or federal waste disposal regulations.

Based upon these considerations, significant adverse solid/hazardous waste impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

XVII. TRANSPORTATION/TRAFFIC.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	paths, and mass transit?				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Impacts on transportation/traffic will be considered significant if any of the following criteria apply:

- Peak period levels on major arterials are disrupted to a point where level of service (LOS) is reduced to D, E or F for more than one month.
- An intersection’s volume to capacity ratio increase by 0.02 (two percent) or more when the LOS is already D, E or F.
- A major roadway is closed to all through traffic, and no alternate route is available.
- The project conflicts with applicable policies, plans or programs establishing measures of effectiveness, thereby decreasing the performance or safety of any mode of transportation.
- There is an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.
- The demand for parking facilities is substantially increased.
- Water borne, rail car or air traffic is substantially altered.
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.
- The need for more than 350 employees
- An increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round trips per day
- Increase customer traffic by more than 700 visits per day.

Discussion

Existing Affected Facilities

Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. No construction is expected at Quemetco. Exide will construct temporary enclosures. It is estimated that an additional 8 worker trips per day and 2 truck trips per day would occur. or Exide for PAR 1420.1 compliance. These trips are below the significance threshold.

Operation Impacts

Based on existing lead point source tests, Quemetco is already complying with PAR 1420.1’s total facility point source limit (0.003 lb/hr) for lead. There will be no physical changes at Quemetco. Additionally, Exide is in the process of closing their facility. In order for Exide to comply with PAR 1420.1 during closure, Exide will continue the current monitoring, housekeeping and maintenance activities, as well as maintain the total enclosures on-site. Therefore, PAR 1420.1 will not result in construction activities at Quemetco, while Exide is expected to construct temporary enclosures. .

XVII. a) & b)

Exide is expected to continue their housekeeping and maintenance activities (i.e. vehicle sweeping, water tank usage, worker trips, air monitoring visits and haul/delivery truck trips). Vehicle sweeping and water tank usage occurs on-site and does not affect public roadways. SCAQMD staff assumed that at any given day would, Exide would generate an additional 2 truck trips per day in the entire district additional for delivery and disposal of hazardous waste. Overall, there would be 1 worker trip for collecting samples and 8 worker trips for housekeeping and maintenance activities. These potential trips are not expected to significantly adversely affect circulation patterns on local roadways or the level of service at intersections near affected facilities. In addition, this volume of additional daily truck traffic is negligible over the entire area of the district.

Table 2-12 Estimation of Vehicle Trips

Phase	Worker Vehicles	Delivery/Disposal Trucks
Operation	9 per day	2 per day ^a

^a A maximum of 1 worker trip for collecting samples and 8 worker trips. A maximum of 2 delivery/disposal trucks may travel in the District

XVII. c) The affected facility is not near any airports or private airstrips. The closest airport or airstrip is the Hawthorne Municipal Airport, which is 9.6 miles from the affected facility. Any actions that would be taken to comply with the proposed project are not expected to influence or affect air traffic patterns or navigable air space, since no new structures or equipment are expected to enter air space used by aircraft. Thus, PAR 1420.1 would not result in a change in air traffic patterns including an increase in traffic levels or a change in location that results in substantial safety risks.

XVII. d) & e) The proposed project does not involve construction of any roadways or other transportation design features, so there would be no change to current roadway designs that could increase traffic hazards. The siting of the affected facility is consistent with surrounding land uses and traffic/circulation in the surrounding areas of the affected facility. Thus, the proposed project is not expected to substantially increase traffic hazards or create incompatible uses at or adjacent to the affected facility. Emergency access at the affected facility is not expected to be impacted by the proposed project. Further, each affected facility is expected to continue to maintain their existing emergency access during closure. Therefore, PAR 1420.1 is not expected to alter the existing long-term circulation patterns and is not expected to require a modification to circulation, thus, no long-term impacts on the traffic circulation system are expected to occur.

XVII. f) The affected facilities would still be expected to comply with, and not interfere with adopted policies, plans, or programs supporting alternative transportation (e.g. bicycles or buses). Since all PAR 1420.1 compliance activities would occur on-site, PAR 1420.1 would not hinder compliance with any applicable alternative transportation plans or policies.

Based upon these considerations, significant adverse transportation/traffic impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

projects, and the effects of probable future projects)

- c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Discussion

XVIII. a) As discussed in the “Biological Resources” section, PAR 1420.1 is not expected to significantly adversely affect plant or animal species or the habitat on which they rely because any construction and operational activities associated with affected sources are expected to occur entirely within the boundaries of existing developed facilities in areas that have been greatly disturbed and that currently do not support any species of concern or the habitat on which they rely. PAR 1420.1 is not expected to reduce or eliminate any plant or animal species or destroy prehistoric records of the past.

XVIII. b) Based on the foregoing analyses, PAR 1420.1 would not result in significant adverse project-specific environmental impacts. Potential adverse impacts from implementing PAR 1420.1 would not be "cumulatively considerable" as defined by CEQA Guidelines §15064(h)(1) for any environmental topic because there are no, or only minor incremental project-specific impacts that were concluded to be less than significant. Per CEQA Guidelines §15064(h)(4), the mere existing of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulative considerable. SCAQMD cumulative significant thresholds are the same as project-specific significance thresholds. Therefore, there is no potential for significant adverse cumulative or cumulatively considerable impacts to be generated by the proposed project for any environmental topic.

XVIII. c) Based on the foregoing analyses, PAR 1420.1 are not expected to cause adverse effects on human beings for any environmental topic. As previously discussed in environmental topics I through XVIII, the proposed project has no potential to cause significant adverse environmental effects. Therefore, no further analysis or mitigation measures are required or necessary.

APPENDICES

APPENDIX A

PROPOSED AMENDED RULE 1420.1

In order to save space and avoid repetition, please refer to the latest version of Proposed Amended Rule 1420.1 located elsewhere in the September 2015 Governing Board Package. The version of Proposed Amended Rule 1420.1 that was circulated with the Draft SEA and released on July 22, 2015 for a 30-day public review and comment period which ended on August 20, 2015 was identified as PAR 1420.1r July 2015. Original hard copies of the Draft SEA, which include the draft version of the proposed amended rule listed above, can be obtained through the SCAQMD Public Information Center at the Diamond Bar headquarters or by calling (909) 396-2039.

APPENDIX B

ASSUMPTIONS AND CALCULATIONS

In order to save space and avoid repetition, please refer to the Draft SEA that was circulated with and released on July 22, 2015 for a 30-day public review and comment period which ended on August 20, 2015 for all of the assumptions and calculations. Original hard copies of the Draft SEA, can be obtained through the SCAQMD Public Information Center at the Diamond Bar headquarters or by calling (909) 396-2039.