

Proposed Amendments to Rule 4603 (Surface Coating of Metal Parts and Products) and Rule 4606 (Wood Products Coating Operations)

(District Project # CEQA 20080479)

Initial Study and Notice of Exemption

September 2008

# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT GOVERNING BOARD 2008

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#### A. PROJECT BACKGROUND INFORMATION

#### 1. Project Title:

Proposed Amendments to District Rule 4603 (Surface Coating of Metal Parts and Products) and Rule 4606 (Wood Products Coating Operations)

#### 2. Lead Agency Name and Address:

San Joaquin Valley Unified Air Pollution Control District 1990 E. Gettysburg Avenue Fresno CA 93726-0244

#### 3. Contact Person:

CEQA: Jessica Willis

(559) 230-5818

Planning: Mr. Joven R. Nazareno

(559) 230-5800

# 4. Project Location:

The rule applies to businesses that perform coating operations during manufacturing of metal parts and products, and wood products which are located within the boundaries of the San Joaquin Valley Unified Air Pollution Control District (See Exhibit 1, Map of District Boundaries).

# 5. Project Sponsor's Name and Address:

San Joaquin Valley Unified Air Pollution Control District 1990 E. Gettysburg Avenue Fresno CA 93726-0244

#### 6. Assessor's Parcel Number:

Not applicable to this project.

# 7. General Plan Designation/Zoning:

Not applicable to this project.

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Exhibit 1
San Joaquin Valley Unified Air Pollution Control District Boundaries





Proposed Amendments to Rule 4603 and Rule 4606

# 8. Project Description:

This project is a rule development project to limit emissions of volatile organic compounds (VOC) from large appliances, metal furniture, and flat wood paneling products coating operations. This Initial Study is based on the proposed amendments to District Rule 4603 (Surface Coating of Metal Parts and Products) and Rule 4606 (Wood Products Coating Operations) dated August 21, 2008.

The proposed amendments to Rule 4603 would incorporate the emission standards promulgated by the United States Environmental Protection Agency (EPA) in the Control Techniques Guidelines documents (EPA 453/R-07-004 and EPA 453/R-07-005) dated September 2007 for large appliance and metal furniture coating operations. The proposed amendments to Rule 4606 would incorporate the EPA emission standards in the Control Techniques Guidelines document (EPA 453/R-06-004) dated September 2006 for flat wood paneling products coating operations. Adoption of the proposed amendments to Rule 4603 and Rule 4606 would implement Reasonably Available control Measure (RACT and Reasonably Available Control Measure (RACM) as mandated by federal Clean Air Act for ozone nonattainment areas such as the San Joaquin Valley Air Basin. The proposed amendments will benefit air quality using coatings that have lower volatile organic compound (VOC) contents. As such, the rule has no negative environmental impacts.

# Proposed Amendments to Rule 4603

The following are the proposed amendments to Rule 4603:

- Include the definitions of extreme high gloss, large appliance part, large appliance product, metal furniture, multi-component coating, and one-component coating. The existing term "pretreatment wash primer" would be renamed "pretreatment coating" for consistency with term used in Table 2. Similarly, the term "pretreatment wash primer" would be renamed "pretreatment coating" in Table 1 for consistency with the same term used in Table 2. The new or modified definitions would improve the clarity, effectiveness, and enforceability of the rule.
- New Section 5.3.1 and new Table 2 would specify the coating limits for large appliance parts or products coating operations, or metal furniture coating operations whose VOC emissions, including related cleaning activities, at a stationary source are equal to or greater than 3.0 tons per 12-month rolling period, before consideration of controls. The VOC content limits in Table 2 of the rule range from 275 grams/liter (2.3 pounds/gallon) to 420 grams/liter (3.5 pounds/gallon) of coating, less water and exempt compounds, as applied, depending on the type of coating. The coatings VOC content limits in Table 2 of

the rule are consistent with the CTG limits. The new coatings VOC content limits are effective on and after April 16, 2009.

- Operators of large appliance parts or products coating operations, or metal furniture coating operations would need to keep the applicable records required by Section 6.2 to demonstrate if the VOC emissions from all large appliance parts or products coating operations, or metal furniture coating operations, including related cleaning activities, are equal to or greater than 3 tons of VOC per 12-month rolling period.
- New Section 5.3.2 would specify that large appliance parts or products coating operations, or metal furniture coating operations whose VOC emissions, including related cleaning activities, at a stationary source are less 3.0 tons per 12-month rolling period, before consideration of controls at a stationary source, would need to comply with the applicable VOC content limits of coatings specified in Sections 5.1 and 5.2. This new provision is necessary to prevent relaxation of an existing SIP-approved rule since such sources are currently subject to the existing rule.
- Existing Section 5.5.4 (VOC Emission Control System Requirement) would be modified to include a calculation equation to determine if the minimum required overall capture and control efficiency of an ernission control system is at equivalent or greater level of VOC reduction as would be achieved using compliant materials, or work practices.
- New Section 5.6 would include provisions for work practice standards that apply to large appliance parts and products, and metal furniture coating operations, including cleaning activities, where the total VOC emissions are equal to or greater than 3.0 tons per 12-month rolling period.
- Section 6.3 (Test Methods)

The existing test methods provision to demonstrate compliance with the rule requirements would be revised to allow operators to use alternate test methods other than specified in the rule provided they have been approved by the APCO, California Air Resources Board (ARB), and United States Environmental Protection Agency (EPA). This change would provide operators flexibility to use other test methods that are equally efficient and accurate, but less expensive than the methods prescribed by the existing rule.

 As recommended by EPA, Section 6.3.7 (Determination of Overall Capture and Control Efficiency) would be modified to include two calculation equations for determining the capture efficiency and the control efficiency of a VOC emission control system.  The proposed amendments to Rule 4603 would become effective on and after April 16, 2009. Since the sources subject to the proposed coatings VOC limits are already using compliant coatings a longer compliance deadline is not needed.

# Proposed Amendments to Rule 4606 (Wood Products Coating Operations)

The following are the proposed amendments to Rule 4606:

Section 1.0 (Purpose) and Section 2.0 (Applicability)

These sections would be modified to clearly indicate that the rule applies also to flat wood paneling coating operation instead of just wood products coating operations. This clarification is necessary because the current definition in the rule for wood products does not specifically include flat wood paneling products.

Section 3.0 (Definitions)

As recommended by EPA, the definitions of Class II hardboard panel finishes, exterior wood siding, flat wood paneling coating operations, flat wood paneling product, hardwood plywood, natural finish hardwood plywood panel, panel, particleboard, printed interior panel, and tileboard would be included in Section 3.0. AS recommended by EPA, these definitions are similar to the definitions in EPA's 1978 CTG for Factory Surface Coating of Flat Wood Paneling (EPA-450/2-78-032), Placer County APCD Rule 238 (Factory Coating of Flat Wood Paneling), and SCAQMD Rule 1104 (Wood Flat Stock Coating Operations). These definitions would improve the clarity and effectiveness of the rule since these terms are used in the rule.

New Section 5.2 and New Table 3 (Flat Wood Coating Operation)

New Section 5.2 and new Table 3 would specify the coating limits for flat wood paneling products coating whose VOC emissions, including related cleaning activities, at a stationary source are at least 15 pounds/day before consideration of controls. Table 3 of the rule would specify that for all flat wood paneling product categories, the VOC content limit of the coating would be 250 grams/liter (2.1 pounds/gallon) of coating, excluding water and exempt compounds, as applied. Operators would need to keep applicable records required by Sections 6.2, 6.4, and 6.5 to demonstrate if the VOC emissions from flat wood paneling products coating operation exceed 15 pounds per day of VOC emissions. The new coating VOC content limits are effective on and after April 16, 2009.

 New Section 5.3.2 would specify that flat wood paneling products coating operations whose VOC emissions, including related cleaning activities, at a stationary source are less 15 pounds per day, before consideration of controls at a stationary source, would need to comply with the applicable VOC content limits of coatings specified in Sections 5.1 Tables 1 or 2. This new provision is necessary to prevent relaxation of an existing SIP-approved rule since such sources are currently subject to the existing rule.

 New Section 5.4.4 (VOC Control System Efficiency for Flat Wood Paneling Product Coating Operation):

Existing Section 5.3, allows an operator to install and operate an APCO-approved VOC emission control system in lieu of complying with the coatings VOC content limits. Existing Section 5.4 specifies the criteria for an APCO-approved control system. The current control efficiency for wood products coating operations is 85 percent. However, for flat wood paneling products coating operations VOC control system, new Section 5.4.4 would specify an overall capture and control efficiency of at least 90 percent by weight.

 New Section 5.6 (Work Practice Standards for Flat Wood Paneling Product Coating Operation)

This new section would specify the work practice standards for flat wood paneling product coating operations. The work practice standards are consistent with the CTG as discussed in Section IIIC of the staff report.

6.8.5 (Determination of Overall Capture and Control Efficiency)

As recommended by EPA, two equations would be added for calculating the capture efficiency and the control efficiency of a VOC emission control system.

Compliance Schedule

The proposed amendments to Rule 4606 would become effective on and after April 16, 2009. Since there is no flat wood coating facilities currently operating in the San Joaquin Valley Air Basin, a longer compliance period is not needed.

Existing Section 7.1 allows an operator who becomes subject to the requirements of the rule through loss of exemption status allowed by Section 4.0 would need to be in full compliance with the rule with 12 months from the date that an exemption status is lost. District staff is proposing to revise Section 7.1 that would require the operator to be in compliance with the rule requirements effective on and after the date that the exemption is lost.

# 9. Other Agencies Whose Approvals Are Required and Permits Needed:

This project is a rule development project and does not require permits from any agency. The United States Environmental Protection Agency must approve the rule for inclusion into California's State Implementation Plan.

# 10. Name of Person Who Prepared Initial Study:

Joven R. Nazareno Senior Air Quality Engineer

September 5, 2008

# B. <u>ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED</u>

projec	nvironmental factors checked be t, involving at least one impact icant Unless Mitigated", as indic	that is a "Potentially Sign	ificant I	mpact" or "Potentially
	Aesthetics  Biological Resources  Hazards & Hazardous  Materials  Mineral Resources  Public Services  Utilities/Service  Systems	Agriculture Resources Cultural Resources Hydrology/Water Quality Noise Recreation Mandatory Findings of Significance		Air Quality Geology/Soils Land Use/Planning Population/Housing Transportation/Traffic
C.	DETERMINATION			
	fy that this project was independ ts the independent judgment of		yzed an	d that this document
$\boxtimes$	I find that the proposed project is Resource Code 15061 (b)(3), an	•		
	I find that the proposed project C and a NEGATIVE DECLARATION		icant eff	ect on the environment,
	I find that although the prop environment, there will not be measures described on an attacl NEGATIVE DECLARATION will	a significant effect in this hed sheet have been adde	s case	because the mitigation
	I find that the proposed project NENVIRONMENTAL IMPACT RE		ect on t	ne environment, and an
	I find that the proposed project I at least one effect 1) has been applicable legal standards, and 2 the earlier analysis as describ significant impact" or "potential IMPACT REPORT is required, addressed.	adequately analyzed in a 2) has been addressed by ed on attached sheets, ly significant unless mitiç	n earliei mitigat if the gated."	r document pursuant to ion measures based on effect is a "potentially An ENVIRONMENTAL
Signa		Da	ate:	7/5/08
Printed	d name: Scott Nester			

# D. <u>ENVIRONMENTAL IMPACT CHECKLIST</u>

I. AESTHETICS Would the proposal:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Affect a scenic vista or scenic highway?				X
b) Have a demonstrable negative aesthetic effect?				X
c) Create light or glare?				X
<b>Discussion:</b> The proposed project is a rule develop that would affect aesthetics, as identified above (a-c)		he project does	s not impose red	quirements
Mitigation: None				
Reference: Proposed Rule 4603, Proposed Rule 46	06 and supporti	ng staff report.		
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II. AGRICULTURE RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, agencies may refer to the California Agricultural Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation optional model to use in assessing impacts on agriculture and farmland.  Would the project:  a) Convert Prime Farmland, Unique Farmland Farmland of Statewide Importance (Farmla shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program	Potentially Significant Impact , or nd), as	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
California Resources Agency, to non-agricuuse?				
b) Conflict with existing zoning for agricultural a Williamson Act contract?	use, or			х
c) Involve other changes in the existing environments which, due to their location or nature, could in conversion of Farmland, to non-agriculturuse?	result			х

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting agricultural resources, as identified above (a-c).

Mitigation: None

by po th W	TR QUALITY There available, the significance criteria established of the applicable air quality management or air collution control district may be relied upon to make the following determinations.  Total the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?				X
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				x

1	IR QUALITY Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
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 which exceed quantitative thresholds for ozone precursors)?				х
d)	Expose sensitive receptors to substantial pollutant concentrations?				х
e)	Create objectionable odors affecting a substantial number of people?				х

**Discussion**: The proposed project is a rule development project. The purpose of this rule project is to limit VOC emissions from large appliances, metal furniture, and flat wood paneling products coating operations thereby improving air quality as changes are implemented by individual affected sources. No adverse impacts to air quality are anticipated by adopting this rule.

Mitigation: None

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	IOLOGICAL RESOURCES  /ould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
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?				х
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				x
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				x
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?				х
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			-	х

IV. BIOLOGICAL RESOURCES (Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
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?				x

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting biological resources, as identified above (a-f).

Mitigation: None

Reference: Proposed Rule 4603, Proposed Rule 4606 and supporting staff report.

	JLTURAL RESOURCES ould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?				x
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?				х
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				х
d) .	Disturb any human remains, including those interred outside of formal cemeteries?				х

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting cultural resources, as identified above (a-d).

Mitigation: None

	EOLOGY/SOILS ould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				x
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				х
	ii) Strong seismic ground shaking?				X
	iii) Seismic-related ground failure, including liquefaction?				х

	EOLOGY/SOILS Continued)  iv) Landslides?	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
	<del></del>				X
b)	Result in substantial soil erosion or the loss of topsoil?				X
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?				х
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?				х
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?				х

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting geology/soils, as identified above (a-e).

Mitigation: None

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1	IAZARDS & HAZARDOUS MATERIALS  Would the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				x
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				х
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				х
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				x
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				х

	IAZARDS & HAZARDOUS MATERIALS Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				x
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				х
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				x

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting hazards and hazardous materials, as identified above (a-h).

Mitigation: None

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\	HYDROLOGY/WATER QUALITY  Nould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
( a)	Violate any water quality standards or waste discharge requirements?				X
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
с)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?				x
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?				х
e)	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?				х
f)	Otherwise substantially degrade water quality?				Х

	HYDROLOGY/WATER QUALITY (Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				, <b>X</b>
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				х
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				х

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting agricultural resources, as identified above (a-i).

Mitigation: None

Reference: Proposed Rule 4603, Proposed Rule 4606 and supporting staff report.

	AND USE/PLANNING  /ould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Physically divide an established community?				Х
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?				х
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting land use/planning as identified above (a-c).

Mitigation: None

	INERAL RESOURCES ould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
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?				x
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?				х

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact		
<b>Discussion:</b> The proposed project is a rule development project. The project does not impose requirements						

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting mineral resources, as identified above (a-b).

Mitigation: None

Reference: Proposed Rule 4603, Proposed Rule 4606 and supporting staff report.

XI. N	OISE /ould the project result in:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				x
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				х
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				X
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				X
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				х
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				х

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting noise, as identified above (a-f).

Mitigation: None

XII. POPULATION/HOUSING Would the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
<ul> <li>a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</li> </ul>				x

1	COPULATION/HOUSING	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				х

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting population/housing, as identified above (a-c).

Mitigation: None

Reference: Proposed Rule 4603, Proposed Rule 4606 and supporting staff report.

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	PUBLIC SERVICES ould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				x
	Fire protection?				X
	Police protection?				X
	Schools?				х
	Parks?				X
	Other public facilities?				X
b)	Cumulatively exceed official regional or local population projections?				χ .
c)	Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?				х
d)	Displace existing housing, especially affordable housing?				х

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting public services, as identified above (a-d).

Mitigation: None

XIV.	RECREATION	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				x

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting recreation, as identified above (a-b).

Mitigation: None

Reference: Proposed Rule 4603, Proposed Rule 4606 and supporting staff report.

	<b>TRANSPORTATION/TRAFFIC</b> Would the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?				x
b)	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?				х
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?				х
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				х
e)	Result in inadequate emergency access?				Х
f)	Result in inadequate parking capacity?			_	Х
g)	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				x

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting transportation/traffic, as identified above (a-g).

Mitigation: None

	UTILITIES/SERVICE SYSTEMS  Vould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				x
c)	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				х
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				x
e)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				х
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				х
g)	Comply with federal, state, and local statutes and regulations related to solid waste?				х

**Discussion:** The proposed project is a rule development project. The project does not impose requirements affecting utilities/service systems, as identified above (a-g).

Mitigation: None

XVII.	MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	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?			·	X
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 projects, and the effects of probable future projects)?				x

# San Joaquin Valley Unified Air Pollution Control District Initial Study / Notice of Exemption

XVII. MANDATORY FINDINGS OF SIGNIFICANCE (Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact				
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?				х				
<b>Discussion:</b> This project is a rule development project. No significant adverse impacts on the categories outlined above are anticipated as a result of this project. <b>Mitigation:</b> None								
Reference: Proposed Rule 4603, Proposed Rule 4606 and supporting staff report.								