

San Joaquin Valley
Air Pollution Control District

APR - 2030

Project Ambient Air Quality Analysis Applicability
Determination under CEQA

Approved By:


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I. PURPOSE

The purpose of this policy is to provide the Lead Agency guidance to determine the significance of a project's impact on ambient air quality under the California Environmental Quality Act (CEQA).

II. APPLICABILITY

This policy applies to any project subject to CEQA. For emissions from new or modified stationary sources identified under an Authority to Construct (ATC) application, an Ambient Air Quality Analysis (AAQA) shall be conducted pursuant to District Rule 2201 (New and Modified Stationary Source Review Rule) permitting requirements when specific thresholds are exceeded.

III. DEFINITION

On-site Emissions: emissions from stationary and mobile sources operating within the boundary of the project.

Off-Site Mobile Emissions: emissions from project-related mobile sources (including on-road diesel truck emissions) operating within a ¼ mile of the project boundary.

Criteria Pollutant: a pollutant for which either a National Ambient Air Quality Standard (NAAQS) has been established by the U.S. Environmental Protection Agency (EPA) or a California Ambient Air Quality Standard (CAAQS) by the California Air Resources Board (CARB).

IV. BACKGROUND

The District's thresholds of significance for ambient air quality are based on the CAAQS and NAAQS. A project would be considered to have a significant impact if any of its Criteria Pollutants are predicted to cause or contribute to any violation of a CAAQS or NAAQS.

V. PROCEDURE FOR AMBIENT AIR QUALITY ANALYSIS FOR STATIONARY SOURCE PROJECTS

Basis of Analysis

The general term "stationary source projects," refers to projects that are subject to District air quality permitting. "Stationary source projects" are proposals that include, at least in part, equipment or activities that are subject to air quality permitting.

The District recommends an AAQA be performed for ALL Criteria Pollutant emissions for which an ambient air quality standard exists when a stationary source project would result in an increase of 100 pounds per day screening level of ANY Criteria Pollutant for any of the following categories:

- Construction emission activities,
- Operational permitted source activities, or
- Operational non-permitted source activities

The Criteria Pollutants evaluated under an AAQA consist of those pollutants in which an ambient air quality standard exists, such as those listed in the CAAQS or NAAQS.

It is important to note, if ammonia (NH₃) or volatile organic compounds (VOC) emissions are determined to be greater than 100 pounds per day for the project, such pollutants are not required to be evaluated under an AAQA since there are no CAAQS or NAAQS for these pollutants. Furthermore, in the event NH₃ or VOC emissions are determined to be greater than 100 pounds per day, the remaining project Criteria Pollutants for which an ambient air quality standard exists would need to be evaluated under an AAQA. The current CAAQS and NAAQS can be found at: <http://www.valleyair.org/aqinfo/attainment.htm>.

Construction and Operational Project Related Emissions

To determine if a project's impact is predicted to cause or contribute to any violation of a CAAQS or NAAQS under CEQA, the following steps are recommended:

Step 1: Calculate if any construction or operational pollutant exceeds 100 pounds per day for any of the following three categories:

Construction Emissions

The daily construction emissions should be calculated on a pollutant-by-pollutant basis by calculating the maximum potential to emit on a daily basis utilizing project-specific information where available, and should include on-site emissions from construction emission sources. If project-specific information is not readily available, the daily construction emissions may be calculated by dividing the total construction emissions by the total number of days the construction will occur on, including on-site emissions from construction emission sources.

Operational Emissions – Permitted Equipment and Activities

The daily operational emissions for permitted equipment and activities should be calculated on a pollutant-by-pollutant basis by calculating the maximum potential to emit on a daily basis during annual operations utilizing project-specific information where available, and should include emissions from all permitted sources. If project-specific information is not readily available, the daily operational emissions for permitted equipment and activities may be calculated by dividing the annual emissions from all permitted sources by the number of days of annual operation.

Operational Emissions – Non-Permitted Equipment and Activities

The daily operational emissions for non-permitted equipment and activities should be calculated on a pollutant-by-pollutant basis by calculating the maximum potential to emit on a daily basis during annual operations utilizing project-specific information where available, and should include emissions from all non-permitted sources. If project-specific information is not readily available, the daily project operational emissions for non-permitted equipment and activities may be calculated by dividing the annual on-site emissions from non-permitted sources by the number of days of annual operation.

If none of the daily emission increases for any of the above three categories exceeds 100 pounds per day of any pollutant after implementation of all mitigation measures, the project is not expected to cause or contribute to any violation of the ambient air quality standards. In this case, no further emission calculation is needed, and no AAQA is required.

If daily emission increases for any of the above three categories exceed 100 pounds per day of any pollutant after implementation of all mitigation measures, an AAQA shall be conducted according to the following:

- When daily emission increases exceed 100 pounds per day for the construction category only, the AAQA shall evaluate sources only from that category as described in Step 2 below.
- When daily emission increases exceed 100 pounds per day for either operational category, permitted or non-permitted sources, the AAQA shall evaluate sources from both operational categories, permitted or non-permitted sources combined as described in Step 2 below.
- When daily emission increases exceed 100 pounds per day for the construction category and either operational category, permitted or non-permitted sources, the AAQA shall evaluate sources from both operational categories, permitted or non-permitted sources combined as described in Step 2 below.
- When daily emission increases exceed 100 pounds per day for all three categories (i.e. construction emission sources, operational permitted emission sources, and operational non-permitted emission sources), the AAQA shall evaluate all sources associated with construction and operations as described in Step 2 below.

Step 2: Perform Ambient Air Quality Analysis

When an AAQA is triggered for any one pollutant, to ensure that no CAAQS or NAAQS is exceeded, ALL Criteria Pollutant emissions for which an ambient air quality standard exists shall be evaluated for the category or categories it is triggered, construction and/or operational emissions.

The AAQA shall be performed in accordance with District Policy APR 1925 (Policy for District Rule 2201 AAQA Modeling). Typically, APR 1925 is applied to projects subject to District Rule 2201 (New and Modified Stationary Source Review Rule).

In addition to assessing the sources per District Policy APR 1925, the AAQA shall include all sources of emissions determined to trigger an AAQA according to Step 1 above.

Note, construction sources consist of off-road equipment from earth moving activities and mobile sources. Operational sources consist of permitted sources (i.e. – boilers, process heaters, etc.) and operational non-permitted sources consist of project-related mobile emissions.

It is important to note, the assessment of operational emissions in the AAQA shall evaluate operational sources within the project boundary as well as project-related mobile emissions within ¼ mile of the project boundary. Furthermore, when construction and operational emissions are occurring concurrently, emissions from both categories shall be assessed together.

Step 3: Determine Project Significance

If the modeling demonstrates that emissions are predicted to cause or contribute to a violation of an ambient air quality standard by exceeding any of the CAAQS or NAAQS, then the project would be considered to have a significant impact on ambient air quality. Likewise, if the modeling demonstrates that emissions are not predicted to cause or contribute to a violation of an ambient air quality standard by not exceeding any of the CAAQS or NAAQS, then the project would be considered to have a less than significant impact on ambient air quality.

VI. PROCEDURE FOR AMBIENT AIR QUALITY ANALYSIS FOR DEVELOPMENT PROJECTS

The general term “development projects” refers generally to a land use development project such as a residential project, commercial project, an industrial project, or a transportation project.

The District recommends an AAQA be performed for ALL Criteria Pollutant emissions for which an ambient air quality standard exists when a development project would result in an increase of 100 pounds per day screening level of ANY pollutant for any of the following categories:

- Construction emission activities
- Operational permitted source emission activities, or
- Operational non-permitted source emission activities

The Criteria Pollutants evaluated under an AAQA consist of those pollutants in which an ambient air quality standard exists, such as those listed in the CAAQS or NAAQS.

It is important to note, if ammonia (NH₃) or volatile organic compounds (VOC) emissions are determined to be greater than 100 pounds per day for the project, such pollutants are not required to be evaluated under an AAQA since there are no CAAQS or NAAQS for these pollutants. Furthermore, in the event NH₃ or VOC emissions are determined to be greater than 100 pounds per day, the remaining project Criteria Pollutants for which an ambient air quality standard exists would need to be evaluated under an AAQA. The current CAAQS and NAAQS can be found at: <http://www.valleyair.org/aqinfo/attainment.htm>.

Step 1: Development Project Screening

Development Projects below District Rule 9510 Applicability Thresholds

As discussed in more in the District Guidance for Assessing and Mitigating Air Quality Impact (GAMAQI) document, Section 8.4.4, development projects below the District Rule 9510 (Indirect Source Review) applicability thresholds in section 2.1 are not expected to violate any air quality standards or contribute substantially to an existing or projected air quality violation and will not exceed the thresholds of significance for ambient air quality. In this case, no AAQA is required.

Development Projects above District Rule 9510 Applicability Thresholds

For development projects above the District Rule 9510 applicability thresholds in section 2.1, proceed to Steps 2 and 3.

Steps 2 and 3: Performing AAQA and Determining Project Significance

Utilize Steps 2 and 3 according to Section V above.