Appendix A - Example Air Quality Impact Methodology

This appendix includes a copy of relevant pages from the following California Energy Commission (CEC) documents as referenced in **Section 2.0, Comments and Responses on the Draft EIR**, Letter No. 5 and Letter No. 18:

CEC, CPV Sentinel Energy Project, Final Staff Assessment, Air Quality Addendum, CEC 700-2008-005-FSA-AD, April 2010.

CEC, Watson Cogeneration Steam and Electric Reliability Project, Final Staff Assessment, CEC 700-2011-002-FSA, August 2011.

Final Staff Assessment
Air Quality Addendum

CPV Sentinel Energy Project

Application For Certification (07-AFC-3)
Riverside County

CALIFORNIA ENERGY COMMISSION

DOCKET 07-AFC-3	
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STAFF REPORT

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percent oxygen averaged over one hour. This is consistent with emissions levels used in other projects and is agreed to by staff.

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

Energy Commission staff assesses four kinds of primary and secondary[2] impacts: construction, operation, closure and decommissioning, and cumulative. Construction impacts result from the onsite and offsite emissions occurring during site preparation and construction of the proposed project. Operational impacts result from the emissions of the proposed project during operation, which includes all of the onsite auxiliary equipment emissions (emergency engine and gasoline tank), the onsite maintenance vehicle emissions, and the offsite employee and material delivery trip emissions. Closure and decommissioning impacts occur from the onsite and offsite emissions that would result from dismantling the facility and restoring the site. Cumulative impacts result from the proposed project's incremental effect, together with other closely related past, present and reasonably foreseeable future projects whose impacts may compound or increase the incremental effect of the proposed project. (Pub. Resources Code § 21083; Cal. Code Regs., tit. 14, §§ 15064(h), 15065(c), 15130, and15355.)

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

CEC staff evaluates potential impacts per Appendix G of the CEQA Guidelines (CCR 2006) as appropriate for the project. A CEQA significant adverse impact is determined if potentially significant CEQA impacts cannot be mitigated appropriately through the adoption of Conditions of Certification. Specifically, Energy Commission staff uses health-based ambient air quality standards (AAQS) established by the ARB and the U.S.EPA as a basis for determining whether a project's emissions would cause a significant adverse impact under CEQA. The standards are set at levels that include a margin of safety and are designed to adequately protect the health of all members of the public, including those most sensitive to adverse air quality impacts such as the aged, people with existing illnesses, children, and infants. Staff evaluates the potential for significant adverse air quality impacts by assessing whether the project's emissions of criteria pollutants and their precursors (NOx, VOC, PM10 and SO2) could create a new AAQS exceedance (emission concentrations above the standard), or substantially contributes to an existing AAQS exceedance.

Staff evaluates both direct and cumulative impacts. Staff would find that a project or activity would create a direct adverse impact when it causes an exceedance of an AAQS. Staff would find that a project's effects are cumulatively considerable when the project emissions in conjunction with ambient background, or in conjunction with reasonably foreseeable future projects, substantially contribute to ongoing exceedances of an AAQS. Factors considered in determining whether contributions to ongoing exceedences are substantial include:

1. the duration of the activity causing adverse air quality impacts;

Watson Cogeneration Steam and Electric Reliability Project

Final Staff Assessment

CALIFORNIA
ENERGY COMMISSION
Edmund G. Brown, Jr., Governor

AUGUST 2011
CEC 700-2011-002-FSA

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ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

Energy Commission staff assesses four kinds of primary and secondary impacts: construction, operation, closure and decommissioning, and cumulative. Construction impacts result from the onsite and offsite emissions occurring during site preparation and construction of the proposed project. Operational impacts result from the emissions of the proposed project during operation, which includes all applicable new onsite auxiliary equipment emissions, and the offsite employee and material delivery trip emissions. Closure and decommissioning impacts occur from the onsite and offsite emissions that would result from dismantling the facility and restoring the site. Cumulative impacts result from the proposed project's incremental effect, together with other closely related past, present and reasonably foreseeable future projects whose impacts may compound or increase the incremental effect of the proposed project. (Pub. Resources Code § 21083; Cal. Code Regs., tit. 14, §§ 15064(h), 15065(c), 15130, and15355.)

Method and threshold for determining significance

Energy Commission staff evaluates potential impacts per Appendix G of the CEQA Guidelines (CCR 2006) as appropriate for the project. A CEQA significant adverse impact is determined if potentially significant CEQA impacts cannot be mitigated appropriately through the adoption of Conditions of Certification. Specifically, Energy Commission staff uses health-based ambient air quality standards (AAQS) established by the ARB and the U.S.EPA as a basis for determining whether a project's emissions would cause a significant adverse impact under CEQA. The standards are set at levels that include a margin of safety and are designed to adequately protect the health of all members of the public, including those most sensitive to adverse air quality impacts such as the aged, people with existing illnesses, children, and infants. Staff evaluates the potential for significant adverse air quality impacts by assessing whether the project's emissions of criteria pollutants and their precursors (NOx, VOC, PM10 and SO2) could create a new AAQS exceedance (emission concentrations above the standard), or substantially contributes to an existing AAQS exceedance.

Staff evaluates both direct and cumulative impacts. Staff would find that a project or activity would create a direct adverse impact when it causes an exceedance of an AAQS. Staff would find that a project's effects are cumulatively considerable when the project emissions in conjunction with ambient background, or in conjunction with reasonably foreseeable future projects, substantially contribute to ongoing exceedances of an AAQS. Factors considered in determining whether contributions to ongoing exceedances are substantial include:

1. the duration of the activity causing adverse air quality impacts;

2. the magnitude of the project emissions, and their contribution to the air basin's emission inventory and future emission budgets established to maintain or attain compliance with AAQS;

3. the location of the project site, i.e., whether it is located in an area with generally good air quality where non-attainment of any ambient air quality standard is primarily or solely due to pollutant transport from other air basins;