SAN BERNARDINO COUNTY
INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

This form and the descriptive information in the application package constitute the contents of Initial Study pursuant to County Guidelines under Ordinance 3040 and Section 15063 of the State CEQA Guidelines.

PROJECT LABEL:

APN:	0231-121-05, 0238-031-07
APPLICANT:	California Steel Industries, Inc.
COMMUNITY:	Fontana / 2nd Supervisorial District
LOCATION:	14000 San Bernardino Avenue, Fontana
PROJECT NO:	P201200171
STAFF:	Tracy Creason, Senior Planner
REP('S):	James E. Pugh, Esq. - Sheppard, Mullin, Richter and Hampton, LLP
PROPOSAL:	Minor Use Permit to construct and operate a closed-loop Wastewater Treatment and Recycled Water Plant that primarily serves the California Steel Industries' sewer and industrial cooling water needs on approximately 7 acres adjacent to the more than 370-acre CSI facility

USGS Quad:	Guasti/Fontana
T, R, Section:	1S 6W SW ¼ Section 15
Thomas Bros.:	
Planning Area:	Fontana Sphere of Influence
Land Use Zoning:	Regional Industrial (IR)
Overlays:	San Sevaine RDA Floodplain Safety Review Area 2 (FP2)

PROJECT CONTACT INFORMATION:

Lead agency:

County of San Bernardino
Land Use Services Department
385 N. Arrowhead Avenue
San Bernardino, CA 92415-0182

County of San Bernardino
Land Use Services Department
15900 Smoke Tree Street, Suite 131
Hesperia, CA 92345

Contact person: Tracy Creason, Senior Planner
Phone No: 760-995-8143 Fax No: 760-995-8167
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Project Sponsor: California Steel Industries, Inc. (Attn: Dennis Poulsen)
1 California Steel Way, P.O. Box 5080
Fontana, California 92335

PROJECT DESCRIPTION:

California Steel Industries, Inc. ("CSI") intends to construct and operate a new Wastewater Treatment and Recycled Water Plant (the "Project" or "WWTP") on an approximately 7-acre parcel (the "Site") that is located on the south side of San Bernardino Avenue adjacent to CSI's approximately 370-acre steel facility in the City of Fontana's sphere of influence. As discussed below, the WWTP would treat sewage inflows primarily from CSI facilities and then return the treated recycled water to CSI's manufacturing processes for industrial cooling water.

Project Purpose

Wastewater generated by CSI employees is presently treated by a private facility owned and operated by ProLogis. That facility is located south of CSI's steel facility and adjacent to the west side of the Site (see Figure 4a). More specifically, ProLogis treats sewage from CSI and several other clients and returns the effluent water for industrial use in CSI's manufacturing process. The effluent water from Prologis has not consistently satisfied CSI's industrial water quality requirements. Thus, CSI must treat the effluent water again before it can be used effectively in CSI's manufacturing processes. This two-step treatment is neither effective nor optimal.

In addition, Prologis terminated the CSI service agreement on August 15, 2010. Prologis continues to accept fees and serve CSI since terminating the agreement. Yet, CSI must have a more reliable sewer service for its steel facility. Thus, CSI decided to design, construct, and operate the proposed WWTP on its own property to manage wastewater and continue to have a source of recycled water for its cooling systems.

Accordingly, the Project is being designed to treat domestic sewage generated by existing and future CSI steel plant employees. Additionally, the Project capacity will be designed to potentially accommodate and treat domestic sewage, if and when feasible, flowing from existing sewer lines on the California Speedway (the "Speedway") property, which is located immediately north of the CSI steel plant property. Total treatment capacity to handle all of these potential sources would be approximately 130,000 gallons/day. This total represents the peak treatment volume, which would occur only when there is a major racing event at the Speedway. Average flow rates at the treatment plant, over the long-term, would be in the range of 30,000 to 80,000 gallons/day.

Project Characteristics

The Project will consist of these facilities to collect and treat CSI sewage flows:

- a new sewage collection and pumping sump to intercept existing sewers on the south side of San Bernardino Avenue
- a screening system to remove coarse debris from the sewage
- a flow storage / equalization tank with mixing
- biological treatment using sequencing batch reactor ("SBR") technology
- CA Title 22 filtration, including chemical coagulation capabilities
- CA Title 22 ultraviolet light disinfection
- filtration & disinfection processes will be sized for future expansion
- treated wastewater will be pumped to the existing cooling water storage tank

In addition, the Project will be designed with capacity to potentially include the Speedway and adjacent warehouse sewage with these facilities, if and when feasible, and with approval of any required regulatory utility compliance:

- a second sewage collection and pumping sump near the Speedway
- a second screening system at the Speedway sump
- a second flow storage / equalization tank with mixing near the Speedway
- a second SBR bio-reactor at the CSI treatment plant

Preliminary plot plans and wastewater process flow charts provide additional details regarding the Project's structures and processes. Please refer to Figure 6 in this report for a plot plan view of the proposed WWTP layout and list of equipment and structures.

Project Infrastructure

To facilitate treatment of wastewater from the various sources described above, the existing wastewater collection infrastructure will be utilized to the maximum extent possible. However, additional collection and conveyance components will be required to deal with peak flows generated

during events at the Speedway, as well as new components needed to deliver the sewage flow into the proposed WWTP.

For incorporation of the potential wastewater generated at the Speedway, the existing 12-inch line running south from the Speedway property that crosses into the CSI property at an approximate location of 34-05.173N, 117-29.728W would need to be altered. At this location, diversion of Speedway event-generated flow to the proposed Project facilities would occur, with the excess flow processed by a screenings station that is followed by a lift station. The lift station will pump the screened wastewater to an existing, approximately one-million-gallon storage tank on the Speedway property, via a new line installed parallel to the property line with the Speedway and west to the storage tank. The storage tank will be equipped with mechanical mixing, and if required, odor control. A parallel gravity return line will be used to introduce a controlled flow of this wastewater back into the collection system at the location of the original diversion point, unless a more suitable point is identified.

The termini of all the collection lines currently are within the property of ProLogis. In order to redirect the wastewater toward the new CSI sewage treatment plant, one or more new interceptor manholes will be constructed. New diversion sewer(s) from the interceptor manhole(s) will drain by gravity onto CSI property and into a new headworks structure consisting of a mechanical screen and lift station. The new headworks structure will be constructed just inside the western property line between the CSI and ProLogis property, close to San Bernardino Avenue.

Wastewater Treatment Process

From the collection point, the sewage would be pumped into an existing storage tank within CSI property, equipped with mixing capabilities to keep particulate matter in suspension and avoid septic conditions. Pretreated industrial wastewater from the CSI facility may also be added to the storage tank when the flow of sewage is below the design capacity, for example, if no flow is coming from the Speedway event wastewater storage tank.

The biological treatment component of the new treatment system would be an SBR or similar aerobic suspended-growth process. The SBR technology operates by treating wastewater in batches rather than as a continuous flow-through process. At the end of treatment of the previous batch, the SBR tank will be approximately 70 percent full with treated wastewater and settled biomass. The first step of the next treatment batch is to transfer wastewater from storage to fill the tank. This transfer may take approximately one hour and is performed while the SBR tank is mixed but not aerated. Then the SBR tank is aerated for about two hours for the treatment microorganisms to consume the organic matter and ammonia. Then the aeration is stopped and the biomass is allowed to settle for about an hour. And finally, about 30 percent of the clear supernatant from the top of the tank is drained over about one hour into a covered, un-aerated surge tank and then the next SBR treatment cycle begins.

It is anticipated that initially only one SBR bioreactor will be installed to treat sewage from CSI and potential future growth of the steel plant. To accommodate wastewater flows from the Speedway and adjacent warehouse buildings, if and when feasible, and with approval of any required regulatory utility compliance, a second SBR bioreactor could be added for the northern sewage flow, combined with the equalized release from Speedway event wastewater from storage.

The biologically treated and clarified water in the surge tank is then continuously pumped at a uniform rate to the downstream chemical conditioning, filtration, and disinfection processes. If the water in the surge tank has a very low level of turbidity, no chemical conditioning will be needed prior to filtration. If the turbidity is higher than the desired level, then a coagulant such as ferric chloride will be added to agglomerate the fine turbidity particles into larger clumps that can be more easily removed via filtration. A small dose of organic polymer may also be added to flocculate the coagulated particles to further enhance filtration efficiency. After the water passes through the filter, it will then pass through an enclosed, in-line UV disinfection module with no chemical addition. From the disinfection process, the treated water will be transferred, by gravity drainage or pumping to the cooling tower system as make-up water. These filtration and disinfection steps are a requirement of CA Title 22 for reusing treated sewage and must be accomplished using Title 22 certified equipment.

Solids that are captured by the filter will be backwashed from the filter, and the backwash water will be pumped into the influent storage tank. When the filter backwash solids are pumped into the SBR with the other sewage solids, those solids will all become part of the microbial treatment biomass of the SBR. Some of the solids will break down and be consumed by the biomass and some may remain inert. Due to the inert solids and the growth of treatment biomass from feeding on the wastewater contaminants, the amount of biomass in the SBR will gradually increase and a small portion must be removed each day to keep the process stable for effective settling and decanting clear supernatant.

The portion of biomass (sludge) removed from the SBR daily will be transferred to an aerated holding tank. When a sufficient volume is available, the biomass will be transferred to a batch conditioning tank where chemicals will be added such as ferric chloride and hydrated lime to improve the separation of the water from the solids. Next the conditioned sludge will be pumped slowly into a recessed-chamber filter press for dewatering. Within the press, the filter cloths allow the water to pass and drain from the press, but the solids are retained in the filter chambers. As solids accumulate within the filter press, the pumped feed pressure increases in order to force the water through the accumulated solids and the filter cloths. After several hours of feed pressure, the feed is shut off and the press is opened to drop the dewatered cake sludge from each filter chamber. The dewatered sludge will still contain 70 to 80 percent moisture by weight, but it will no longer be fluid and will have the consistency of moist soil. In this state it can be trucked as a solid off-site for disposal at an authorized facility. The filtrate from the dewatering operation will be returned to the influent storage tank for additional treatment.

There are CA Title 22 reliability requirements for key components (i.e., collection system pumping) to be independent of the main electrical power supply so that they can still function during a power outage. The requirement would be satisfied by using diesel or natural gas-driven pumps, having an emergency generator for the pumps, possibly having electrical supply from two independent power lines or even an in-ground storage tank with capacity to hold at least 24 hours of flow without pumping.

There will be no discharge of treated sewage effluent to the environment. All of the treated wastewater will be recycled for beneficial re-use in CSI's cooling water systems.

Operational Characteristics

The Project will operate 24 hours per day, 7 days per week. CSI may add one additional employee to oversee operation of the new system on the day shift. Existing employees will check operations and respond to any alarms for non-staffed shifts.

There will be minimal truck traffic associated with the Project. The small quantities of O&M chemicals that may be needed for operation of the Project will be included on existing chemical shipments to the CSI property. The small amount of biosolid waste residuals from the Project will be shipped approximately once a week to an authorized land disposal site on a typical solid waste hauling truck or possibly a smaller truck, depending on the volumes involved and the location of the disposal site.

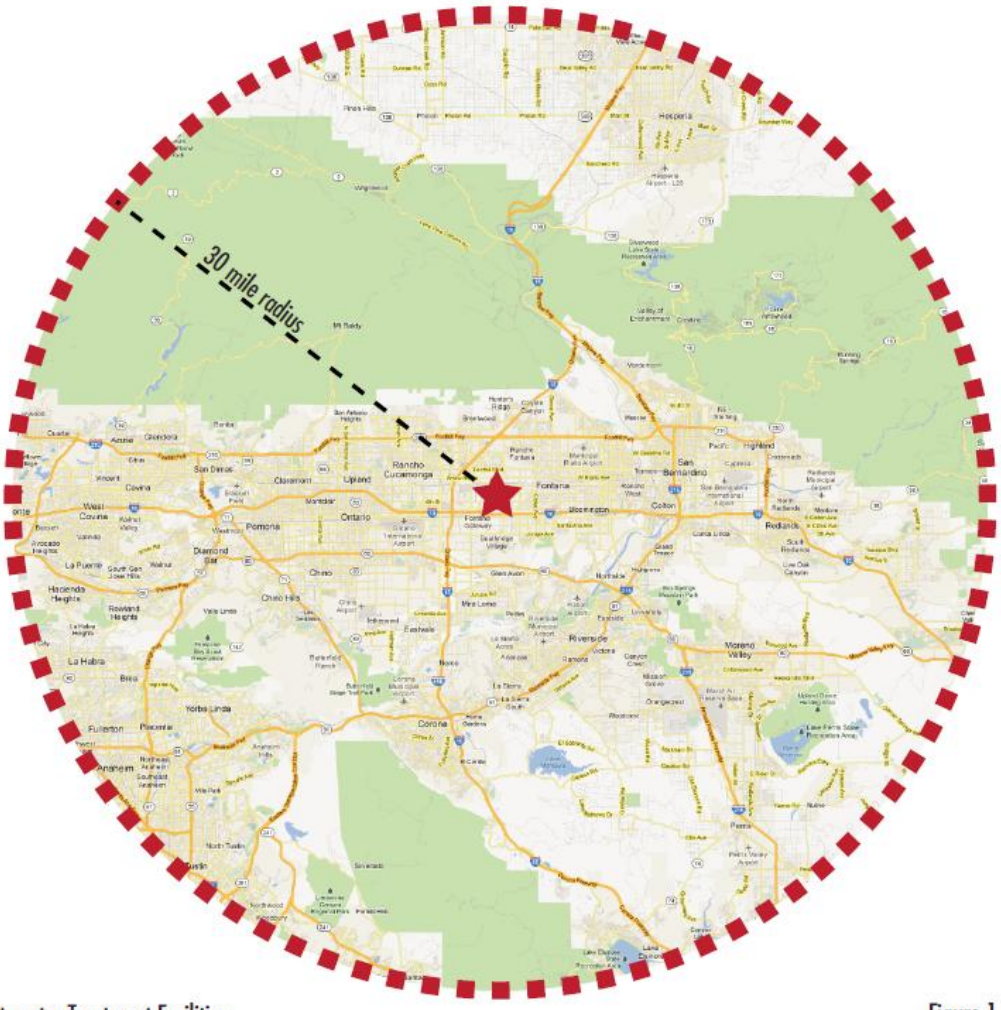
Construction Program

Construction work is estimated to occur over a three to four month period, involving up to ten workers per day and the equipment listed below (totals of each are for the entire construction period). All work would occur on private property.

- 1 backhoe loader or excavator – 1 month
- 1 compaction machine – 1 week
- 2 cranes – 1 month
- 40 concrete trucks
- 1 concrete pumper
- 30 delivery trucks
- 2 generators – 2 months
- 2 welders – 1 month

Minor excavation to connect the present terminus at the ProLogis plant to the new CSI plant would occur partly on ProLogis property, via an existing easement, and the remainder on CSI property. No excavation is planned for San Bernardino Avenue or any other public access right-of-way or roadway. Additional minor excavation would be needed near the border between CSI and Speedway properties to intercept the existing northern sewage sewer and install a pumping station. Above-ground piping is planned to install an in-ground pressure sewer approximately 2,000 feet to an existing storage tank, and to install a parallel return gravity drainage line from the storage tank back to the existing sewer which continues to the ProLogis property. This northern sewer interception, diversion, and return may be installed on Speedway property for the Speedway to own, operate, and maintain. Additionally, the existing storage tank that could be used for Speedway event sewage is currently on CSI property, but the tank and its immediate surroundings may be transferred to the Speedway via ownership or easement or other legal structure such that the Speedway would be responsible for the potential tank and the stored sewage rather than CSI.

Figure 1: Regional Location Map



Initial Study for CSI Wastewater Treatment Facilities

Figure 1 - Regional Location Map

Figure 2: Project Vicinity Map

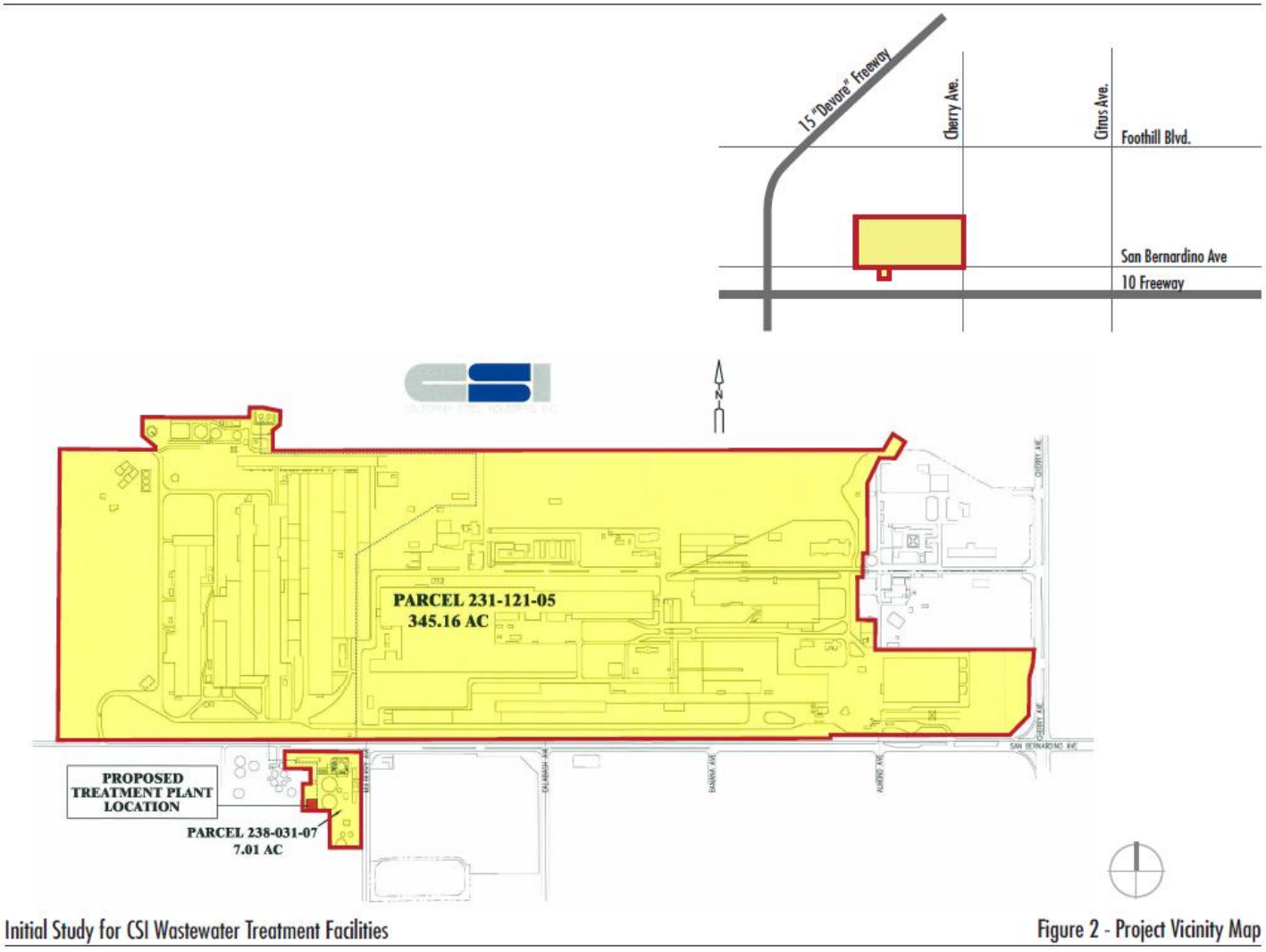


Figure 3: Aerial View of Site and Surroundings

Initial Study for CSI Wastewater Treatment Facilities

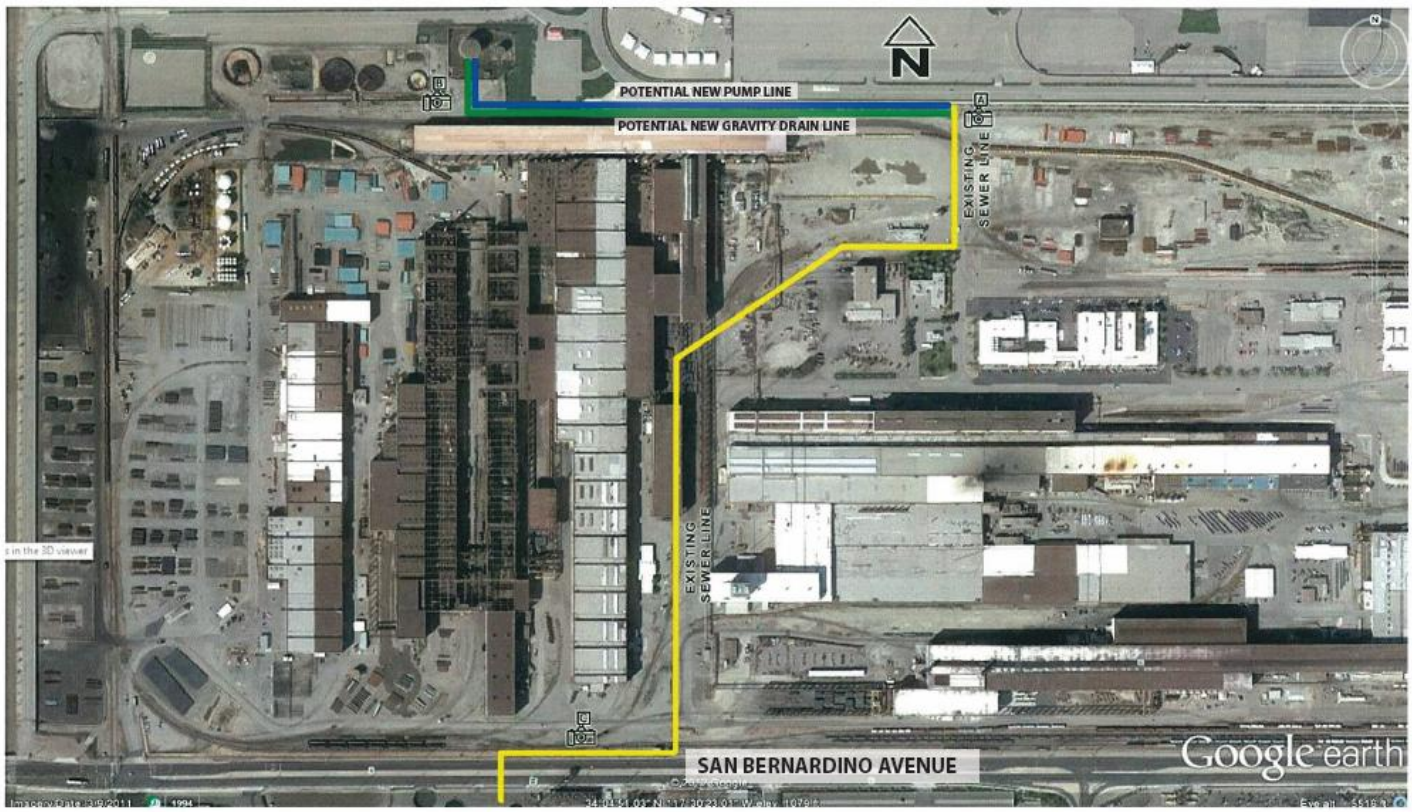
Figure 3 - Aerial View of Site and Surroundings

Figure 4a: Aerial View of Proposed Wastewater Treatment Plant Facilities

Initial Study for CSI Wastewater Treatment Facilities

Figure 4a - Aerial View of Proposed Wastewater Treatment Plant Facilities

Figure 4b: Aerial View of Potential Sewage Diversion/Collection Lines



Initial Study for CSI Wastewater Treatment Facilities

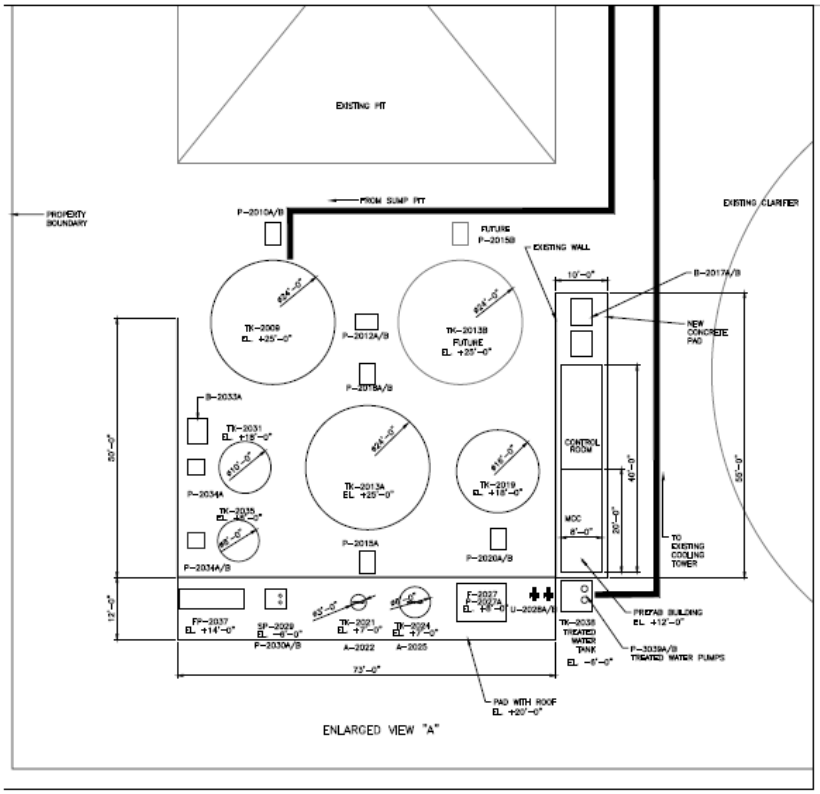
Figure 4b - Aerial View of Potential Speedway Sewage Diversion/Collection Lines

Figure 5: Existing Conditions at Proposed WWTP Site

Initial Study for CSI Wastewater Treatment Facilities

Figure 5 - Existing Conditions at Proposed WWTP Site

Figure : 6 Plot Plan & Equipment Schedule for Proposed Wastewater Treatment Plant



EQUIPMENT DESCRIPTION	EQUIP NO.	EQUIPMENT DESCRIPTION	EQUIP NO.
CSI FLOW EQUALIZATION/STORAGE TANK	TK-2009	COAGULANT METERING PUMP 2 (SHELF SPARE	
CSI STORAGE TANK JET-MIX RECYCLE PUMP 1	P-2010A	FLOCCULATION TANK	TK-2024
JET-MIX RECYCLE PUMP 2 (SHELF SPARE)	P-2010B	FLOCCULATION TANK AGITATOR	A-2025
CSI STORAGE TANK JET-MIX HEADER	U-2011	FLOCCULANT METERING PUMP 1	
SBR FEED PUMP 1	P-2012A	FLOCCULANT METERING PUMP 2 (SHELF SPARE	
SBR FEED PUMP 2	P-2012B	DISC FILTER PACKAGE WITH BACKWASH PUMP	F-2027
SBR TANK 1	TK-2013A	UV LIGHT DISINFECTION SYSTEM 1	U-2028A
SBR 1 JET-AERATION HEADER	U-2014A	UV LIGHT DISINFECTION SYSTEM 2 (STANDBY)	U-2028B
SBR 1 JET-AERATION RECYCLE PUMP	P-2015A	RETURN FLOW SUMP STRUCTURE	SP-2029
SBR 1 DECANTER MECHANISM	U-2016A	RETURN FLOW SUMP PUMP 1	P-2030A
SBR TANK 2 (FUTURE)	TK-2013B	RETURN FLOW SUMP PUMP 2	P-2030B
SBR TANK 2 JET-AERATION HEADER (FUTURE)	U-2014B	AERATED SLUDGE HOLDING TANK	TK-2031
SBR 2 JET-AERATION RECYCLE PUMP (FUTURE)	P-2015B	SLUDGE TANK COARSE-BUBBLE AERATION GRID	U-2032
SBR 2 DECANTER MECHANISM (FUTURE)	U-2016B	SLUDGE AERATION BLOWER 1	B-2033A
SBR AERATION BLOWER WITH VFD 1	B-2017A	SLUDGE AERATION BLOWER 2 (SHELF SPARE)	B-2033B
SBR AERATION BLOWER WITH VFD 2	B-2017B	SLUDGE TRANSFER PUMP 1	P-2034A
SBR SLUDGE EXTRACTION PUMP 1	P-2018A	SLUDGE TRANSFER PUMP 2	P-2034B
SBR SLUDGE EXTRACTION PUMP 2 (FUTURE)	P-2018B	SLUDGE TRANSFER PUMP 3 (SHELF SPARE)	P-2034C
SBR SYSTEM INSTR.& CONTROLS PACKAGE	N/A	BATCH SLUDGE CONDITIONING TANK	TK-2035
SBR DECANT RECEIVING TANK	TK-2019	BATCH SLUDGE CONDITIONING TANK AGITATOR	TK-2035
FILTRATION / DISINFECTION FEED PUMP 1	P-2020A	FILTER PRESS PACKAGE WITH CAKE CARTS	FP-2037
FILTRATION / DISINFECTION FEED PUMP 2	P-2020B	TREATED WATER TANK	TK-2038
RAPID MIX TANK	TK-2021	TREATED WATER PUMP	P-2039A
RAPID MIX TANK AGITATOR	A-2022	TREATED WATER PUMP	P-2039B
COAGULANT METERING PUMP 1			

OFFICIAL USE ONLY

ENVIRONMENTAL/EXISTING SITE CONDITIONS:

The Project would generally located on CSI's property, which covers more than 377 acres along San Bernardino Avenue, between Cherry and Etiwanda Avenues, in an industrialized part of the Fontana sphere of influence (see Figure 2). The Speedway is immediately north of CSI. The CSI property and steel plant operations are a continuation of business activities originally established by Kaiser Steel Company several decades ago. Steel fabrication, storage, administration, security, and related operations cover more than 370 acres on the north side of San Bernardino Avenue. Ancillary wastewater facilities are located on 7 acres on the south side of San Bernardino Avenue, including aeration and holding ponds, holdings tanks, coolant water towers and piping, and storm drainage channels (see Figure 4a). The 7-acre parcel, as well as the larger CSI facility are devoid of natural resources and highly industrialized. Access to the main site is restricted and gate guarded. Chain link fencing and a locked gate restrict access to the 7-acre site.

Note* The information in the table below pertains to existing conditions at and surrounding the 7-acre site on the south side of San Bernardino Avenue, upon which the proposed WWTP will be built on an existing concrete pad. See Figure 5 for photographs of this area.

AREA	EXISTING LAND USE	LAND USE ZONING DISTRICT
SITE	Concrete slab and wastewater treatment facilities	Regional Industrial (IR)
North	California Steel Industries steel fabrication plant	Regional Industrial (IR)
South	Closed landfill	Regional Industrial (IR)
East	Industrial building	Regional Industrial (IR)
West	ProLogis wastewater treatment facilities	Regional Industrial (IR)

Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Federal: None
State of California: Santa Ana Regional Water Quality Control Board
County of San Bernardino: Land Use Services Department – Planning and Building & Safety Divisions; Public Health, Division of Environmental Health Services, Department of Public Works
Local: None

EVALUATION FORMAT

This initial study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based upon its effect on 18 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study Checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. **No Impact**: No impacts are identified or anticipated and no mitigation measures are required.

2. **Less than Significant Impact**: No significant adverse impacts are identified or anticipated and no mitigation measures are required.

3. **Less than Significant Impact with Mitigation Incorporated**: Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)

4. **Potentially Significant Impact**: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

At the end of the analysis the required mitigation measures are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology / Soils
☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials	☐ Hydrology / Water Quality
☐ Land Use/ Planning	☐ Mineral Resources	☐ Noise
☐ Population / Housing	☐ Public Services	☐ Recreation
☐ Transportation / Traffic	☐ Utilities / Service Systems	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the following finding is made:

☒	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION shall be prepared.
☐	Although the proposed project could have a significant effect on the environment, there shall not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION shall be prepared.
☐	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" 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. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature: prepared by Tracy Creason, Planner — Date: 28 AUG 2012

Signature: Heidi Duron, Supervising Planner
Planning Division — Date: 8/29/2012

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
I.	**AESTHETICS** - Would the project				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

SUBSTANTIATION: *(Check ☐ if project is located within the view-shed of any Scenic Route listed in the General Plan):*

a) **No Impact.** This long industrialized area does not comprise or contribute to any scenic vistas. The Project would have no effect on such scenic resources.

b) **No Impact**. There are no trees, rock outcroppings, historic buildings or any other natural or built scenic resources on or near the Site. San Bernardino Avenue, which separates the southern and northern parts of the CSI property, is classified in the County Circulation and Transportation Plan as a Major Divided Highway. This is a functional classification, and this street is not classified as a state scenic highway, nor is it recognized as a scenic corridor on a local level. The Project would have no effect on scenic resources or views along a scenic corridor.

c) **Less than Significant Impact.** The proposed WWTP would include several above-ground structures such as metal tanks, a control room building and ground-level piping and pumping equipment, and all sewer conveyance lines would be placed underground. The largest structures would include the Equalization Tank and Sequencing Batch Reactor biological treatment tanks, all measuring 24 feet in diameter by 25 feet tall. Two other tanks, the SBR decant receiving tank and the Aerated Sludge Holding Tank, would be 18 and 16 feet tall, respectively, and each would have a diameter of 10 feet. All other tanks and structures would be no more than 12-feet tall.

Located approximately 400 feet south of and at a slightly lower elevation than San Bernardino Avenue, and screened by existing cooling towers, fencing, and other existing structures, the WWTP would have little visibility from that public street. The WWTP would be located adjacent to existing wastewater treatment facilities and metal storage tanks and across from the California Steel Industries' steel fabrication plant, within a fully industrialized

area. The Project would be visually compatible with surrounding development character and would not degrade the visual quality of the site or its surroundings.

d) **Less than Significant Impact.** Limited, low-intensity lighting may be located within the proposed WWTP to provide illumination for near mechanical equipment, controls, and instrumentation. Additional lighting might be added for security and occasional night access by employees and maintenance personnel. Such lighting would be similar in height, intensity, and color as existing pole-mounted lighting in that area. All such lighting would be shielded and directed to confine the illumination within the site limits, in accordance with the County's Development Code restrictions, thus avoiding any lighting impact at adjacent properties and preventing any glare onto San Bernardino Avenue.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
II.	**AGRICULTURE AND FORESTRY RESOURCES** - In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

e)	Involve other 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?	☐	☐	☐	☒

SUBSTANTIATION: *(Check ☐ if project is located in the Important Farmlands Overlay):*

a) **No Impact.** The Site and surroundings have been industrialized for a number of years, and there is no farmland on or near this land. As such, the land is not classified by the State Department of Conservation as any type of farmland. The Project would have no impact on State or locally designated farmland.

b) **No Impact.** The Site and surrounding properties are zoned Regional Industrial, and developed with industrial uses. There is no Williamson Act contract affecting the subject property. The Project would have no impact on land zoned for agricultural use or in any way affected by a Williamson Act contract.

c) **No Impact.** The Site and surrounding properties are zoned Regional Industrial, and developed with industrial uses. There is no forest or timber land on or near the Site. The Project would have no impact on land zoned for or designated as forest land or timberland use.

d) **No Impact.** The Site and surroundings have been industrialized for a number of years, and there is no forest land on or near this site. The Project would have no impact on any forest land.

e) **No Impact.** All proposed wastewater treatment and collection facilities would be built within existing developed land, within a long-industrialized area. The Project would have no other kinds of impacts that could affect farmland, agricultural land uses or forest lands.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
III.	**AIR QUALITY -** Where available, the significance criteria established by the applicable air quality management or air pollution control district might be relied upon to make the following determinations. Would the project:				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
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)?	☐	☐	☒	☐
d)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e)	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

SUBSTANTIATION: *(Discuss conformity with the South Coast Air Quality Management Plan, if applicable):*

a) **No Impact.** The Project does not conflict with or obstruct implementation of the applicable air quality plan. The Air Quality Management Plan (AQMP) for the South Coast Air Basin (SCAB) sets forth a comprehensive program that will lead the SCAB into compliance with all federal and state air quality standards. The AQMP control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with the AQMP for development projects is determined by demonstrating compliance with local land use plans. The General Plan Land Use Zoning designation of the Site is Regional Industrial. Since the Project involves the development of an industrial use (i.e., the WWTP), which is consistent with the County General Plan and the applicable land use designations on the Site the Project can be considered in compliance with the AQMP.

Moreover, last updated by the South Coast Air Quality Management District (SCAQMD) in 2007, the regional AQMP is intended to achieve the key objectives of attaining federal air quality standards for concentrations of ozone and fine particulate matter ($PM_{2.5}$). Key strategies to achieve attainment of federal $PM_{2.5}$ standards by 2014 include more focused

control of sulfur oxides (SO_x), directly emitted $PM_{2.5}$, and nitrogen oxides (NO_x) combined with volatile organic compounds (VOC). The main strategy to attain the federal 8-hour ozone standard by 2023 is to build upon the $PM_{2.5}$ control measures, augmented with additional NO_x and VOC reductions. Reducing emissions from mobile sources (exhaust from off-road vehicles, trucks, passenger vehicles, ships and boats, trains) is identified as the primary challenge for improving southern California's air quality.

The Project would generate minor levels of $PM_{2.5}$ and ozone precursors during construction from machinery and vehicle exhausts and possibly some minor grading to install two pump stations and possibly short segments of new sewer pipeline. Operational emissions would be negligible, limited to small level of truck exhausts associated with weekly hauling of biosolid wastes to disposal sites, and indirect emissions associated with the generation of electricity supplied to CSI to operate the WWTP. The Site is paved, which will mean little or no wind-blown dust or particulate matter will leave the Site. As discussed in the next response to b), dust and gaseous emissions generated during the Project's short-term construction activities would be below SCAQMD significance thresholds and would not jeopardize attainment of the AQMP objectives to reduce particulate matter and criteria pollutant emissions. Further, the fully operational Project would generate insignificant levels of criteria pollutants and would not inhibit attainment of the AQMP's objectives to improve regional air quality. With these minor emission levels, the Project would not conflict with the AQMP.

b) **No Impact.** The Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Air quality impacts would include construction exhaust emissions generated from construction equipment, earth moving activities (if necessary), construction workers' commute, and construction material hauling for the construction period. These activities would involve the use of diesel and gasoline-powered equipment that would generate emissions of criteria pollutants such as Carbon Monoxide (CO), Nitrogen Oxides (NO_X), Reactive Organic Gases (ROG) or Volatile Organic Compounds (VOC), Sulfur Oxides ($SO_{X)}$, Particulate Matter less than 10 microns (PM_{10}), and Particulate Matter less than 2.5 microns ($PM_{2.5}$). The construction activities also represent sources of vehicle re-entrained fugitive dust (which includes PM_{10}), a potential concern because the Project is in a non-attainment area for ozone and PM_{10}.

Construction period emissions were quantified, based on the specific equipment and construction crew requirements for this project, and the daily emissions were compared to the construction significance thresholds established by the SCAQMD. The complete air quality analysis is provided as Attachment 1 to this Initial Study. Emission factors and calculations were prepared with the SCAQMD-approved CalEEMod software. Based on the results of the air quality analysis, summarized in Table 1, below, all criteria pollutant emissions would be well below the SCAQMD thresholds for significance during construction activities. Therefore, significant short-term regional air quality impacts due to construction emissions would not occur.

The fully operational wastewater treatment/recycling facilities would typically not generate direct air pollutant emissions, as this will be a closed loop system and the electricity required to operate the plant would be provided from off-site sources maintained by Southern California Edison Company, from whom CSI purchases electricity. If there are temporary

power outages, CSI may use a portable diesel or gasoline-fueled generator already permitted by the SCAQMD for use at their steel plant, to provide back-up electricity to power the pumps and electronic devices that activate and control the treatment process. During such short-term periods, the portable generators would generate minor levels of common gaseous pollutants that would dissipate rapidly and would not result in a violation of an air quality standard or contribute to an existing or projected air quality violation. Exhaust emissions from the average one truck per week required to haul away treated, residual sludge materials, along with the two employee trips/day would be well below SCAQMD significance thresholds, as discussed in the air quality analysis (Attachment 1).

Emissions associated with the fully operational WWTP were also quantified with the CalEEMod software, and compared with SCAQMD's regional significance thresholds (see Attachment 1). Please note that indirect emissions associated with energy consumed in the operation of the WWTP facilities assumes a worst-case scenario of operating at the plant's peak capacity every day of the year, whereas, in actuality, that would occur only on a few weekends of the year when there is a major event at the Speedway. Most of the time, the plant would operate at approximately 25-to-60 percent of peak capacity and thus produce much lower operational emissions resulting from energy consumption. Results of the air quality analysis determined that long-term emissions of all criteria pollutants would be well below the SCAQMD regional significance thresholds during project operation.

Table 1: Construction and Operational Criteria Pollutant Emissions

Emission Category (lbs/day)	NO_x	VOC	PM_{10}	$PM_{2.5}$	SO_x	CO
Construction	13.1	2.2	3.3	0.9	0.0	10.7
SCAQMD Threshold	100	75	150	55	150	550
Exceeds Threshold?	NO	NO	NO	NO	NO	NO
Operation	1.4	0.1	0.1	0.05	0.0	0.7
SCAQMD Threshold	55	55	150	55	150	550
Exceeds Threshold?	NO	NO	NO	NO	NO	NO
Source: ENVIRON, July 27, 2012						

The Project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation because the project's emissions would not exceed thresholds of concern as established by the SCAQMD.

c) **Less Than Significant Impact**. The portion of the SCAB where the Project is located is designated as a non-attainment area for ozone, PM_{10}, $PM_{2.5}$ and NO_2 under state standards, and as a non-attainment area for ozone, PM_{10}, and $PM_{2.5}$ under federal standards.[1] In evaluating the cumulative effects of the Project, Section 21100(e) of CEQA states that "previously approved land use documents including, but not limited to, general plans, specific plans, and local coastal plans, may be used in cumulative impact analysis." In addressing cumulative effects for air quality, the AQMP utilizes approved general plans and, therefore, is the most appropriate document to use to evaluate cumulative impacts of the Project. This is because the AQMP evaluated air quality emissions for the entire SCAB using a future

[1] California Air Resources Board, http://www.arb.ca.gov/desig/adm/adm.htm, accessed July 12, 2012.

development scenario and set forth a comprehensive program that would lead the region, including the project area, into compliance with all federal and state air quality standards. Since the proposed Project is in conformance with the County's General Plan, emission levels associated with the project were accounted for in the AQMP. As noted in the preceding response to item b), project emissions levels would be lower than SCAQMD thresholds for all criteria pollutants and would thus be less than significant on both a regional and local level. The Project will not, therefore, result in a cumulatively considerable net increase of any criteria pollutant. Therefore, the Project impact on the regional attainment/non-attainment status for criteria pollutants is considered less than significant.

d) **No Impact.** The WWTP would not generate air pollutant emissions that expose sensitive receptors to substantial pollutant concentrations. Exhaust emissions from the average one truck per week required to haul away treated, residual sludge materials would be below SCAQD significance thresholds, as discussed in the air quality analysis (Attachment 1). There are no residences, schools, hospitals, convalescent homes or other sensitive land uses near the Site. The Project would not generate substantial emissions of air pollutants that could affect sensitive receptors.

e) **Less Than Significant Impact**. There are no sensitive land uses near the Site and people do not work in or regularly congregate in or near the Site. There would be no objectionable odors produced by the underground sewer lines or the above-ground tanks or other enclosed treatment facilities that could affect a substantial number of people. California Title 22 regulations require that the biological treatment process for water recycling produces wastewater in which the organic matter has been stabilized, is non-putrescible, and contains dissolved oxygen. The main treatment process and the excess biological sludge derived from that process would contain only stable, non-putrescible organic matter and both will contain dissolved oxygen. The treatment process and aerated sludge would have a faint earthy odor that is not considered offensive. There is a remote potential for minor and temporary sewage odor if there is a need to temporarily store untreated wastewater (in an enclosed tank) before it enters the WWTP screening facilities during a power outage or perhaps for maintenance. Such odors could be generated if septic (absence of agitation and/or oxygen) conditions occur, but this would be avoided through activation of jet aeration and/or mixing (supported by back-up power) that would ensure agitation of the wastewater well before the 8 to 12 hours of standing conditions, in hot temperatures, that could produce malodors. Therefore, the Project would have less than significant odor effects.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
IV.	**BIOLOGICAL RESOURCES -** Would the project:				
a)	Have substantial adverse effects, 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION: *(Check if project is located in the Biological Resources Overlay or contains habitat for any species listed in the California Natural Diversity Database ☐): Category N/A*

a) **No Impact.** There is no vegetation or any type of wildlife habitat within the proposed construction footprints, which have been fully disturbed and are covered by asphalt, concrete, compacted soils, and other impervious surfaces. This land provides no habitat value; therefore, the Project would have no impact on any habitat that could support candidate, sensitive, or special status plants or wildlife species.

b) **No Impact**. There is no vegetation or any type of wildlife habitat on the Site, which has been fully disturbed and is covered by asphalt and other impervious surfaces. There are no surface or ground water resources on Site that could support riparian habitat or any other kinds of sensitive natural communities. The Project would have no effect on such biological resources.

c) **No Impact**. There are no surface or ground water resources on the Site that could support riparian habitat or any other kinds of sensitive natural communities. There are no water courses that drain onto the Site and there are no water courses or water bodies downstream that depend on runoff from the Site. The Project would have no impact on any federally-protected wetlands or any other regulated Waters of the U.S.

d) **No Impact.** There is no vegetation or any type of wildlife habitat on the Site, which has been fully disturbed and is covered by asphalt and other impervious surfaces. Adjoining lands on all sides except to the south of the Site are completely developed with a variety of industrial facilities and street improvements, with no resources to support fish or wildlife movement. Vacant, open land immediately south may provide some foraging area for small mammals or some birds, but the Site does not provide any habitat or other values that could support such minor wildlife activities.

e) **No Impact.** There are no local regulations intended to protect biological resources that apply to the Site. Moreover, there are no biological resources on the Site. Thus, the Project would have no impact with respect to local policies or ordinances intended to protect biological resources.

f) **No Impact.** There are no federal, state, or local habitat conservation plans that affect the land use of the Site, and no biological resources on the Site. The Project would not conflict with any conservation plans.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
V.	**CULTURAL RESOURCES** - Would the project				
a)	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

SUBSTANTIATION: *(Check if the project is located in the Cultural ☐ or Paleontologic ☐ Resources overlays or cite results of cultural resource review):*

a) **No Impact.** The WWTP would be built on an existing concrete pad, occupying approximately 4,500 square feet in the southwest corner of a 7-acre site, which is part of the overall CSI property that has been developed with recycled cooling water storage and transmission facilities for many years. No portions of the existing steel plant facilities on the north side of San Bernardino Avenue would be demolished or altered, except for possible minor excavation to install a sewer pump station within flat, bare ground area along the northern boundary. New wastewater conveyance pipes to convey potential flows from the Speedway are planned to be built above ground. All construction work would occur on private land. The existing site improvements are not considered to be historic resources, as defined in §15064.5 of the State CEQA Guidelines; therefore, the Project would have no impact on such resources.

b) **No Impact.** Existing surface level facilities, as described in the preceding response, were built in the modern era, and are not considered to be archaeological resources. Construction activities would require minor ground disturbance to install pump stations and make connections to existing underground sewer lines. Given the high level of land disturbance in this long-industrialized area, the likelihood of encountering subsurface archaeological resources within the Site is considered negligible. The Project would have no impact on archaeological resources.

c) **No Impact.** Excavation is not anticipated to construct the proposed WWTP; therefore, that main component of the Project could not affect subsurface materials that might contain paleontological resources. Construction of new pump stations would involve a small grading footprint and minor amounts of excavation. Given the high level of historical land

disturbance in this long-industrialized area, subsurface soils on-site are not likely to consist of native materials that could potentially contain paleontological resources. No portion of the Site is within a County-designated Paleontological Resource overlay. Impacts to paleontological resources are not anticipated.

d) **No Impact.** There are no known human burial sites on or adjacent to the Site, which is located within a long-industrialized area. With minor excavation for the new wastewater conveyance pipelines only, impacts to potential human remains are not expected.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
VI.	**GEOLOGY AND SOILS** - Would the project:				
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	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.	☐	☐	☒	☐
	ii. Strong seismic ground shaking?	☐	☐	☒	☐
	iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
	iv. Landslides?	☐	☐	☐	☒
b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☐	☒
d)	Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001) creating substantial risks to life or property?	☐	☐	☒	☒
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?	☐	☐	☐	☒

SUBSTANTIATION: *(Check ☐ if project is located in the Geologic Hazards Overlay District):*

a)i-iv. **Less Than Significant Impact.** The entire San Bernardino County area is particularly susceptible to strong ground shaking and other geologic hazards. However, the Site is not located within an Alquist-Priolo Earthquake fault zone. In addition, no earthquake fault

hazards, liquefaction hazards, landslides or other seismic hazards are identified on or near the Site on the County General Plan Geologic Hazard Overlay map for this area. Strong seismic ground motions could occur on site during movement along one of several regional faults, such as the San Andreas, that could result in damage to proposed surface and subsurface facilities. Since the proposed improvements involve wastewater processing and conveyance, with few employees, risks to people would be minimal and consequences would mainly affect the wastewater facilities themselves. All proposed wastewater collection and treatment facilities will be designed and constructed in accordance with the County's current building and safety standards for the types of facilities involved, including provisions to minimize potential damage due to strong seismic ground motions. While damage to site improvements cannot be totally avoided due to such events, compliance with the County's building standards will reduce seismic hazards to a less than significant level.

b) **Less Than Significant Impact.** Since the proposed footprint of the WWTP is within a fully paved area and no excavation is proposed for construction of the treatment plant, soil erosion within the footprint of the treatment plant is not expected. Trenching for construction of wastewater conveyance pipelines and the new pump station to divert flows from existing pipelines to new ones would temporarily expose narrow areas of subsurface materials to wind or possibly stormwater. Soil erosion during wind or rainstorms is not anticipated, however, due to the minor level of temporary soil exposure and incorporation of routine construction practices to prevent and minimize fugitive dust and to divert rainwater around open trenches. If the total grading area exceeds one acre, the Developer will obtain approval of a General Permit for Discharges of Stormwater Associated With Construction Activity from the Santa Ana Regional Water Quality Control Board.[2] This programmatic permit requires engineering specifications and implementation of a range of construction control measures to ensure that exposed ground surfaces in the construction zone are protected properly to prevent erosion and runoff of loose sediment and construction materials and wastes during rainstorms. Project-related impacts, if any, would be less than significant.

c) **No Impact**. As noted in the previous response to item a) in this section, unstable soil conditions that could become hazardous due to seismic events have not been identified on or near the Site. The Project is not identified as being located on a geologic unit or soil that has been identified as being unstable or having the potential to result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. It is noted that a geotechnical investigation was previously conducted to inform the design of the existing water treatment facilities just to the northeast of the Site, and it found that subsurface conditions were acceptable for the construction of 40 tanks and truck loading areas, with standard foundations and appropriately engineered base material.[3] Groundwater was not encountered within the 60-plus feet deep soil borings that were advanced during those investigations. Suitable subsurface conditions are anticipated within the footprint of the proposed WWTP, which consists of a one-foot thick reinforced concrete pad. The specific conditions will be verified through a soils report to be conducted as part of the County's

[2] Construction General Permit Order 2009-0009-DWQ, as amended by 2010-0014-DWQ.
[3] Woodward-Clyde Consultants, *Draft Report for Geotechnical Investigation Water Treatment Facility California Steel Industries, Inc. Fontana, California*. February 17, 1992.

routine building permit procedure for the Project.

d) **Less Than Significant Impact**. The Site is not located in an area that has been identified by the County Building and Safety Geologist as having the potential for expansive soils. Presence or absence of expansive soils beneath the one-foot thick concrete slab where the WWTP would be built will be confirmed as part of the County's routine building permit process for the Project. If expansive characteristics are problematic, typical remedial measures will be taken, such as replacement of near surface materials with properly engineered fill or possibly structural reinforcement of the existing concrete slab. Such remedial measures would have temporary and minor environmental impacts.

e) **No Impact.** No subsurface septic tanks or other types of soil-based wastewater treatment systems are proposed.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
VII	**GREENHOUSE GAS EMISSIONS -** Would the project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b)	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

SUBSTANTIATION:

a) **Less Than Significant Impact.** In January of 2012, the County of San Bernardino adopted a Greenhouse Gas Emissions Reduction Plan (GHG Plan). The GHG Plan establishes a GHG emissions reduction target for 2020 of 15 percent below 2007 emissions, consistent with AB 32 and sets the County on a path to achieve more substantial long-term reduction in the post-2020 period. Achieving this level of emissions will ensure that the contribution to greenhouse gas emissions from activities covered by the GHG Plan will not be cumulatively considerable.

In 2007, the California State Legislature adopted Senate Bill 97 (SB97) requiring that the CEQA Guidelines be amended to include provisions addressing the effects and mitigation of GHG emissions. New CEQA Guidelines have been adopted that require: inclusion of a GHG analyses in CEQA documents; quantification of GHG emissions; a determination of significance for GHG emissions; and, adoption of feasible mitigation to address significant impacts. The CEQA Guidelines [Cal. Code of Regulations Section 15083.5 (b)] also provide that the environmental analysis of specific projects may be tiered from a programmatic GHG plan that substantially lessens the cumulative effect of GHG emissions. If a public agency adopts such a programmatic GHG Plan, the environmental review of subsequent projects may be streamlined. A project's incremental contribution of GHG emissions will not be considered cumulatively significant if the project is consistent with the adopted GHG plan.

Implementation of the County's GHG Plan is achieved through the Development Review Process by applying appropriate reduction requirements to reduce GHG emissions. All new development is required to quantify the project's GHG emissions and adopt feasible mitigation to reduce project emissions below a level of significance. A review standard of 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year is used to identify and mitigate project emissions. For projects exceeding 3,000 $MTCO_2e$ per year of GHG emissions, the developer may use the GHG Plan Screening Tables as a tool to assist with calculating GHG reduction measures and the determination of a significance finding. Projects that garner 100 or more points in the Screening Tables do not require

quantification of project-specific GHG emissions. The point system was devised to ensure project compliance with the reduction measures in the GHG Plan such that the GHG emissions from new development, when considered together with those from existing development, will allow the County to meet its 2020 target and support longer-term reductions in GHG emissions beyond 2020. Consistent with the CEQA Guidelines, such projects are consistent with the Plan and therefore will be determined to have a less than significant individual and cumulative impact for GHG emissions.

Project-related GHG emissions were quantified for construction activities and for permanent operations, with the use of the "CalEEMod" software program developed for the South Coast Air Quality Management District to assist in the quantification of GHGs and assist Lead Agencies in evaluating the significance of project-level GHG emissions. Sources of GHGs associated with the operating WWTP facilities include indirect emissions from energy sources that provide electricity to power the WWTP and pump station facilities, and vehicular exhaust from the one additional employee's daily commute trips and once weekly truck trip to haul away sludge wastes. The calculations conservatively estimated the level of energy consumption and indirect GHG emissions associated with the peak treatment capacity of the WWTP, which could occur during several times of the year when there is a major event at the Speedway, if and when feasible, and with approval of any required regulatory utility compliance. Most of the time, the WWTP would operate at about 25 to 60 percent of that peak capacity and would, therefore, generate lower levels of indirect GHG emissions. GHG modeling assumptions, calculation worksheets and results are provided in Attachment 1 to this Initial Study.

The results of the GHG analysis indicate that the Project would generate approximately 266 $MTCO_2e$ per year, well below the County's threshold of 3,000 that would require additional design and operational measures to reduce total GHG levels. Therefore, Project-related GHG impacts would, be less than significant.

b) **No Impact.** As noted in the response to a), above, in January of 2012, the County of San Bernardino adopted a Greenhouse Gas Emissions Reduction Plan (GHG Plan), along with procedures for reviewing individual land use proposals to ensure that project-level impacts are evaluated to ensure incremental compliance with the countywide plan strategies. Total construction and operational GHG emissions were calculated with the CalEEMod software, using project-specific inputs. As noted above, the calculated GHG emissions are well below the level at which further design and operational measures would be required to reduce emissions and conform to the County's GHG Plan. The Project is consistent with the County's GHG Plan.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
VIII	**HAZARDS AND HAZARDOUS MATERIALS -** Would the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION:

a) **Less Than Significant Impact**. Minor amounts of potentially hazardous chemicals would be transported to the Site, for storage and periodic application in the wastewater treatment process, to meet California Health and Safety Code, Title 22 standards for recycled water treatment. This could include ferric chloride, as both a pre-filtration coagulant and as a conditioning agent for sludge dewatering. Flocculent polymer may be used to enhance the filtration process. Hydrated lime may be used for sludge conditioning prior to dewatering, with or without ferric use. Estimated chemicals, rate of usage, storage quantities, and anticipated type of storage are listed below. Such chemicals would be transported on existing trucks that bring materials to the CSI steel plant and would not require additional trucks or special handling. Chemical product storage, maintenance, and accidental spill response measures will be implemented, in accordance with County Fire Department regulations. The Project would result in less than significant impacts involving handling, storage, and transport of hazardous materials.

Chemical	Commercial Form	Projected Peak Usage Rate	Projected Storage Quantities	Type of Storage
Ferric Chloride	30% FeCl3 solution	3 gallons/day (90% for sludge dewatering + 10% as filter aid)	Two-three 55-gallon drums	Outdoors in a curbed containment area
Flocculant Polymer	Liquid emulsion	<0.05 gallon/day if needed	One 5-gallon carboy	Outdoors in a curbed containment area
Hydrated Lime	Dry powder	20 pounds/day	Twenty 40-pound bags	Beneath a canopy roof, next to the filter press

Approximately 100 – 700 pounds/day of a sludge material (soil-like, but still containing 70 to 80 percent moisture) would be generated as a by-product of the biological treatment process to be employed in the WWTP. The smaller number represents the amount produced in conjunction with treating CSI wastes only, while the higher number represents the potential amount produced, if and when feasible, and with approval of any required regulatory utility compliance, during peak conditions when there is a major racing event at the Speedway. This is classified as an organic waste, not a hazardous waste, with different disposal limitations depending on the amount of pathogens that have been removed. This waste will need to be trucked off site once a week for disposal at appropriately permitted facilities, such as composting sites, waste-energy facilities, or landfills. There are a number of existing private and publicly operated facilities in San Bernardino County that are permitted to handle

the biosolids from the Project. As such, disposal of the Project's biosolid wastes would not result in significant hazards to the environment or human health.

b) **Less Than Significant Impact.** Minor quantities of hazardous materials may be transported, stored and applied during the construction program, for activities such as welding, equipment maintenance and fueling, coatings, etc. All such materials would be properly stored within sealed containers that are within secured locations within the construction staging area, in accordance with existing construction safety standards. Contractors and work crews will be responsible for proper handling, storage, prevention, and accidental spill response/cleanup of all hazardous materials. Project-related hazards during construction would be less than significant. As noted in the preceding response to item a), daily operations of the completed facilities would result in less than significant impacts involving transport, handling, storage, and disposal of hazardous materials.

c) **No Impact.** The Project would not produce hazardous or toxic emissions, would not produce or involve handling of acutely toxic materials or wastes. Transport, storage, handling, and disposal of minor volumes of potentially hazardous chemicals associated with the waste treatment process would not result in significant impacts, as discussed in the previous responses to a) and b) in this section. There are no schools within a quarter mile of the Site.

d) **Less Than Significant Impact.** The CSI property appears on the State Department of Toxic Substances Control (DTSC) list of sites reported under state and federal regulations concerning hazardous materials. A Tiered Permit was issued in the 1990s for regulation of substances associated with the industrial treatment plant process. This permit is administered now by the County of San Bernardino, as a Certified Unified Program Agency (CUPA) and CSI is in compliance with all aspects of that permit. Additionally, DTSC is the oversight agency in connection with assessment and remediation of soil contamination, under the Expedited Remedial Action Program (ERAP).

Site assessment activities conducted in and around the areas of concern (AOCs) at the facility indicated that soils were affected by petroleum hydrocarbons, metals such as beryllium, chromium, and lead, and polynuclear aromatic compounds (PAHs). An area-specific risk-based approach to investigating the 31 AOCs was conducted which employed an iterative, phased process to meet the objectives of the site investigation. To support remedial activities and protect human health, risk assessments for each AOC were conducted at the Site following guidance set forth in the ERAP document. Based on the results of the Site investigation and risk assessment, a Remedial Action Plan (RAP) was submitted to DTSC recommending an industrial deed restriction be selected as the remedial alternative for the Site. In addition, a Soils Management and Transportation Plan (SMTP) was prepared and submitted to DTSC. The SMTP outlines procedures for soil moving activities that are anticipated as part of future maintenance and improvement activities at the Site. The RAP and SMTP will be implemented as Project Design Features.

Based on the Site Investigation, Risk Assessment, RAP, and SMTP submitted to DTSC, construction activities in the proposed WWTP area should not pose a risk to human health or the environment. Project impacts would be less than significant.

e) **No Impact.** The Site is more than four miles away from the Ontario International Airport and

more than five miles from the Rialto Municipal Airport. It is not governed by any airport land use plans. The low-level WWTP facilities would have no effect on any airspace or air traffic.

f) **No Impact.** There are no private airstrips in the vicinity of the Site.

g) **No Impact.** All construction work would occur within private property limits and would have no effect on any public streets or other emergency evacuation routes. The Project would have no impact on emergency response plans or emergency evacuation plans.

h) **No Impact.** There are no wildland conditions in this urbanized and long-industrialized area.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
IX	**HYDROLOGY AND WATER QUALITY -** Would the project:				
a)	Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
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)?	☐	☐	☐	☒
c)	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 that would result in substantial erosion or siltation on- or offsite?	☐	☐	☐	☒
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 offsite?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f)	Otherwise substantially degrade water quality?	☐	☐	☒	☐
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?	☐	☐	☐	☒
h)	Place within a 100-year flood hazard area structure which would impede or redirect flood flows?	☐	☐	☐	☒

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?	☐	☐	☐	☒
j)	Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

SUBSTANTIATION:

a) **No Impact.** The proposed WWTP would not generate any effluent that would be discharged outside of the facility. All treated water would be recycled and used as cooling water for CSI's existing manufacturing operations. The industrial wastewater that remains after the manufacturing process is discharged in a permitted brine line. Development of the WWTP does not trigger the need for any additional or modified discharge permits. No water resources would be affected and no wastewater discharge permits would be required.

b) **No Impact.** The Project will not 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, because the Project would not involve any groundwater extraction or any discharges of effluent to any surface or groundwater. In addition, the Site is completely impervious and does not currently contribute to any groundwater recharge.

c) **No Impact.** The proposed WWTP would be located within an area that is currently paved and runoff drains to existing nearby drainage channels that flow into a detention basin within CSI property. This drainage condition would not be altered by the Project. The piping, tanks, screens, and control equipment would not generate additional runoff. The Project would not result in erosion or siltation impacts as a result of site runoff.

d) **No Impact.** The Project will not 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 that would result in flooding on- or off-site. The Project does not propose any substantial alteration to a drainage pattern, stream, or river. The Site is fully paved. No change will occur because of Project construction.

e) **No Impact.** The Project will not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Runoff from the developed WWTP would not increase in volume or worsen composition from current conditions. The Project will have no effect on the capacity or the characteristics of runoff handled by the existing private surface drainage controls on the CSI property. Downstream properties, as well as capacity in the local and regional drainage systems, would not be negatively impacted, especially considering that the Project does not increase or change volume, velocity, or direction of stormwater flows originating from the Site.

f) **Less Than Significant Impact.** Surface level improvements associated with the WWTP

would not generate water pollutants that could degrade the water quality of site runoff. The facility would be constructed to prevent leaks, coated to prevent rusting and with limited surface area, would not enable buildup of significant quantities of atmospheric pollutants that could be washed off during rain storms.

g) **No Impact.** Although the Site is within the Floodplain Safety Review Area 2 (FP2), which includes areas with limits between the base flood (100-year flood) and a 500-year flood, and certain areas subject to 100-year flooding with an average depth less than one foot, it does not propose any housing.

h) **No Impact.** The Site, and the area in general, contains numerous and widespread industrial structures and uses. The Project will not impede or redirect flows.

i) **No Impact.** The Project would not 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. The Site is not within any identified path of a potential inundation flow that might result in the event of a dam or levee failure or that might occur from a river, stream, lake, or sheet flow situation.

j) **No Impact.** The Project will not be impacted by inundation by seiche, tsunami, or mudflow. The Project is not adjacent to any body of water that has the potential of seiche or tsunami nor is the project site in the path of any potential mudflow.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
X.	**LAND USE AND PLANNING** - Would the project:				
a)	Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

SUBSTANTIATION:

a) **No Impact**. The Project would not physically divide an established community because there are no established residential communities present in the project area. Furthermore, all proposed wastewater treatment and collection facilities would be built within already developed private land within CSI property, except for sump pumps and sewer diversion lines potentially to serve the adjacent Speedway, which would be located on the Speedway property, if and when feasible, and with approval of any required regulatory utility compliance.

b) **No Impact.** The Project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect. The Project is consistent with all applicable land use policies and regulations of the County Code and General Plan. The Project will comply with all hazard protection and land use regulations. In addition, construction and operation of the proposed Project would serve CSI's existing steel fabrication plant and potential future expansion, along with existing wastewater flows from the Speedway site, if and when feasible, and with approval of any required regulatory utility compliance. The WWTP would be built and operated by CSI, next to existing wastewater treatment facilities operated by Pro Logis, and thus would be compatible with adjacent land uses. The Project is considered an extension of the existing CSI steel plant facility. It requires authorization through the conditional approval of a Minor Use Permit, which is intended to ensure sound design that complies with the provisions of the San Bernardino County Development Code, with minimal environmental impact, for a land use activity which is considered appropriate within the Regional Industrial zoning that applies to this property.

c) **No Impact.** There is no habitat to support plants or wildlife species within the project limits and there is no conservation plan established to protect biological resources within this long-industrialized area. Therefore, the Project does not conflict with any applicable habitat conservation plans or natural community conservation plans.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XI.	**MINERAL RESOURCES** - 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION: *(Check ☐ if project is located within the Mineral Resource Zone Overlay):*

a) **No Impact.** The Project will not result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state. There are no identified important mineral resources on the Site and the Site is not within a Mineral Resource Zone Overlay. In addition, there is no mineral extraction occurring within or near any portion of the CSI property, including the Site. The Project does not require any substantial grading that could result in the loss of known mineral resources.

b) **No Impact.** There is no mineral extraction occurring within or near any portion of the CSI property, including the Site. No important mineral resources have been identified on site and the Site is not within any area recognized in the County General Plan as containing existing or potentially important mineral resources. None of the locational criteria set forth in Section 82.017.020 of the County Development Code for designating land in a Mineral Resource Zone occurs on site.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XII.	**NOISE** - Would the project result in:				
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?	☐	☐	☒	☐
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION: *(Check if the project is located in the Noise Hazard Overlay District ☐ or is subject to severe noise levels according to the General Plan Noise Element ☐):*

a) **Less Than Significant.** Mechanical equipment in the WWTP, such as the pumps and aeration jets, would generate a low level of noise on a daily basis. This noise would be similar to noise associated with the adjacent ProLogis wastewater treatment facilities and would blend readily into the ambient noise environment. The closest people who could be exposed to this noise would be CSI employees involved in operating the WWTP and/or in other activities associated with existing steel plant facilities in that area. There are no adjacent uses where there would be a concentration of people that could hear this noise. As such, the Project-generated noise would represent a minor and less than significant change from existing conditions and would not expose persons to or generate noise levels that would exceed any applicable noise exposure standards.

b) **Less Than Significant Impact**. The Project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels, because the Project does not generate groundborne noise or vibration and it will comply with the vibration standards of the County Development Code.

c) **Less Than Significant Impact.** The Project will not generate a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing or allowed without the Project. The Project does not contain operational components that would create noise sources that are significantly different than the existing ambient noise environment currently on the Site.

d) **Less Than Significant Impact.** During project construction, a variety of construction machinery and vehicles would generate noise of varying levels that would increase local ambient noise conditions for temporary periods during the construction workday. The noise impact would be highly localized to the area of the active construction zone and a limited distance from the construction activity. Noise levels would vary in accordance with the type and number of construction equipment vehicles being operated at any particular time and would change throughout the workday. Construction would not require the use of unusually loud machinery or any activities involving repeated vibrations. All construction work would occur in compliance with the time period restrictions set forth in the County Development Code Section 83.01.080(g). As such, the temporary construction noise impacts are exempt from the noise level restrictions that would apply to a stationary or mobile noise source and such impacts are considered to be less than significant.

   The fully operating WWTP would generate minor noise from operating pumps, aeration blowers, and possibly other mechanical equipment. Such noise would be masked within the ambient noise environment, similar to noise at the existing ProLogis wastewater treatment facilities. As stated earlier, there are no sensitive receptors who would be exposed to this minor noise source. The Project would not result in a substantial change in the existing noise environment.

e) **No Impact**. The Site is located more than four miles away from Ontario International Airport and more than five miles from Rialto Municipal Airport, the two closest airports. As such, the Site is not governed by land use plans for either airport and is not significantly impacted by air traffic noise.

f) **No Impact.** There are no private airstrips in the vicinity of the Site.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XIII.	**POPULATION AND HOUSING** - Would the project:				
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)?	☐	☐	☐	☒
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SUBSTANTIATION:

a) **No Impact.** The proposed WWTP is a private infrastructure improvement that would replace and upgrade CSI's existing wastewater treatment service and provide a secure source of treated effluent for CSI's industrial process water coolant system. It would also provide additional domestic wastewater treatment capacity to accommodate increased employee loads due to potential future expansion of the CSI steel plant facilities. A majority of the capacity of the WWTP will be allocated to the existing steel plant, and potential sewage flows from an existing sewer line on the adjacent auto speedway; thus no growth would occur due to that portion of the Project's wastewater treatment capacity. The remaining capacity would be allocated to treat wastes from potential future expansion on the CSI property. No other infrastructure improvements are proposed and no new vehicular access would be required. The Project would not induce growth that could not otherwise occur and would not result in significant growth-inducing effects.

b) **No Impact.** There is no housing on or near the Site; therefore, the Project would have no impact on any housing resources.

c) **No Impact.** The Site does not presently support any structures that house people on a temporary or permanent basis. The Project would not dislocate any persons or create a need for construction of any replacement housing.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XIV. PUBLIC SERVICES				
a) Would the project 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:				
Fire Protection?	☐	☐	☒	☐
Police Protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other Public Facilities?	☐	☐	☐	☒

SUBSTANTIATION:

a) **Less Than Significant Impact**. The Project would generate a minor demand for fire protection services, primarily during the plan checking phase and to conduct inspections to ensure proper installation of fire suppression features and proper storage of chemical products used in the wastewater treatment process. Since the new facilities would consist mainly of non-flammable metal piping, metal storage tanks, and a metal control building, fire hazards would be minimal and less than significant. If a fire should occur within the new treatment facilities site, response capability from existing County Fire Department stations would be sufficient. The Project would not require construction of any new or expanded Fire Stations or other fire protection facilities.

With no public access or any kinds of features that might attract public attention or vandalism, the WWTP would generate little, if any, demand for police (Sheriff Department) services. Existing fencing and locked gate access would continue to provide an adequate level of security. The Project would not require construction of any new or expanded Sheriff stations or other public safety/law enforcement facilities.

CSI may add one new employee to operate the proposed WWTP during the day shift, and would assign existing employees to conduct periodic checks and to respond to alarms during non-staffed hours. This new employee, even if it were someone who does not

presently live in this area and has a family, would not create a demand for additional housing or have an impact on the local school district or any public park sites.

Ongoing maintenance and operation of the WWTP would be handled by CSI and would not require any support from any public agencies.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XV.	**RECREATION**				
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION:

a) **No Impact**. This Project will not 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. The Project will not generate any new residential units and the impacts to parks generated by the employees of this Project will be minimal. CSI may add one new employee to operate the proposed WWTP during the day shift, and would assign existing employees to conduct periodic checks and to respond to alarms during non-staffed hours. This new employee, even if it were someone who does not presently live in this area and has a family, would not significantly affect any existing parks or other recreational facilities.

b) **No Impact**. There are no public or private recreation facilities on or near the Site; therefore, the Project would have no impact on such facilities. There would be no recreational activities associated with the proposed wastewater conveyance and treatment facilities, and thus no impact leading to expansion or construction of recreational facilities.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impacts*
XVI.	**TRANSPORTATION/TRAFFIC -** 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 greenways, pedestrian and bicycle 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.	☐	☐	☒	☐
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?	☐	☐	☐	☒
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e)	Result in inadequate emergency access?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION:

a,b) **Less Than Significant Impact**. During the construction phases, the Project would generate minor increases in vehicular traffic involving passenger vehicles and light duty trucks for workers commuting to/from the job site, truck delivery/removal of construction materials and equipment, and concrete trucks. Volumes of such traffic would fluctuate, depending on the particular construction phase. A peak construction day could generate approximately 20 passenger vehicle trips associated with 10 worker commutes, plus 40 concrete truck trips associated with 20 concrete trucks, plus 2 trips by a concrete pumper truck, plus 2 trips by a truck containing a generator. These volumes would not result in a

significant impact to local street traffic flows or significant intersection congestion and would not have a significant impact on the performance of the local, regional, or state motor vehicle transportation network.

CSI may hire one new employee to staff the day shift at the completed and operational WWTP. If so, that employee would generate approximately two passenger vehicle trips a day, resulting in an insignificant impact on the local, regional, and state motor vehicle travel networks. Small amounts of chemical products will be brought on site on a periodic basis; these would be transported via trucks that already travel to/from the site delivering other materials and supplies for the existing steel plant operations. No new truck trips would be generated to handle the chemical deliveries associated with the WWTP. Approximately one truck per week would be required to haul away sludge materials created as biosolid waste by-products at the end of the wastewater treatment process. It is anticipated that standard trash disposal trucks or possibly smaller trucks would be utilized to dispose of these wastes, given the estimated 100 to 700 pounds/day of waste sludge that could be generated. The one truck trip a week associated with sludge disposal would result in less than significant impacts on the local, regional, and state motor vehicle transportation networks. The Project would not conflict with any performance standards contained in any circulation plans, policies, ordinances, the countywide congestion management program or other such regulations.

c) **No Impact**. All proposed site improvements would be low-level, (i.e. 12 to 25 feet high) or underground and would have no effect on any air traffic patterns. Operation of the WWTP facility would have no effect on the location of any air travel facility.

d) **No Impact**. The Project would not require any alterations to Site access from San Bernardino Avenue and would not require any alterations to existing public streets or highways. The Project would have no effect on roadway hazards.

e) **Less Than Significant Impact**. All construction work would occur on private land; therefore, there would be no impacts to through traffic on any public right-of-way. The periodic truck and passenger vehicle trips that would occur during construction would be minor and would not result in traffic congestion impacts that would constrain emergency vehicle access. Following construction, there would be minimal impact to the local and regional transportation network and the responsiveness of emergency vehicles, since this Project would generate an insignificant level of traffic, as discussed in the response to item a) earlier in this section.

f) **No Impact**. Although the City of Fontana offers a Demand Response / Ride Sharing program for seniors and special needs citizens, they offer it only with the incorporated jurisdiction. Omnitrans offers bus service in the general area. No public transit, bicycle, or pedestrian facilities exist within the CSI property. There are no transit stops, transit stations, or other support facilities, bicycle lanes, or sidewalks along the adjacent segment of San Bernardino Avenue. The Project would thus have no impact on any such alternative modes of travel.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVI.	**UTILITIES AND SERVICE SYSTEMS -** Would the project:				
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded, entitlements needed?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f)	Be served by a landfill(s) with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g)	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

SUBSTANTIATION:

a) **No Impact**. The Project does not exceed wastewater treatment requirements of the Regional Water Quality Control Board, Santa Ana Region, as determined by County Public Health – Environmental Health Services. The Project is not subject to the permitting authority of the Santa Ana Regional Water Quality Control Board's (SARWQCB) water quality standards and regulating procedures, because it would not generate new point or non-point sources of wastewater discharges. All of the treated effluent would be used as cooling water in CSI's existing industrial processing facilities, which discharge into an industrial brine line maintained by the Inland Empire Utility Agency (IEUA), pursuant to an existing permit issued

by the SARWQCB. The Project will be designed to provide water treatment in accordance with State of California Title 22 regulations for design of wastewater treatment facilities, to provide adequate levels of filtration of the domestic wastewater generated by CSI employees, and future employees at the planned industrial buildings on site. The WWTP will have the capacity to provide treatment for wastewater generated by patrons and employees at the adjacent auto speedway, if and when feasible, and with approval of any required regulatory utility compliance. No processing of any industrial waste water streams or other 'special' types of wastewater would occur in the proposed WWTP.

b) **No Impact**. The Project is in fact a new wastewater treatment facility. However, as demonstrated in this Initial Study, neither the construction nor operation of the WWTP would cause a significant environmental impact. No other water or wastewater infrastructure would be required to support the proposed Project improvements.

c) **No Impact**. As discussed in the earlier responses to items IX c-f), proposed site improvements do not include and would not require any storm drainage controls and would have a negligible effect on existing drainage conditions. There are no public storm drain systems affected by site runoff under existing conditions and thus the Project would have no impact on such facilities.

d) **No Impact**. The Project is a wastewater treatment and recycling plant. Accordingly, the WWTP accepts sewage inflows, treats and recycles the water, and then discharges it to CSI's manufacturing operations for industrial cooling water. In other words, the WWTP is a virtually closed-loop system that treats sewage and does not demand water. Therefore, the Project does not require additional water supplies.

Moreover, when operating at maximum capacity during a major professional auto racing event weekend, the WWTP has the potential to treat up to an estimated 130,000 gallons of wastewater/day, if and when feasible, and with approval of any required regulatory utility compliance. The water consumed for this process is already consumed by the interior plumbing devices that drain or flush into the local sewer lines, thus no new water demand would occur in conjunction with operation of the Project until such time as there may be some additional growth of the CSI plant. This future water demand could be supplied by Fontana Water Company, which previously indicated that they have sufficient water supplies to meet the demand of 500,000 square feet of new industrial buildings on the CSI property, when that project was under review by the County for approval of a tentative subdivision map and Conditional Use Permit (County Project No. P201000498/CUP). Minor amounts of water would periodically be consumed for dilution of treatment chemicals, and for cleaning of filters and screening systems. This water could be supplied from existing potable or recycled water lines, depending on which are closest. The Project would not require acquisition of additional water supply resources or entitlements thereto.

e) **No Impact**. The Project is proposed as a private facility, to be owned and operated by CSI. All of the treated effluent would be recycled for use as cooling water in CSI's existing industrial processing facilities. This Project-related wastewater would replace the wastewater currently generated by the Prologis treatment facility that is recycled for the same purpose, and thus would not affect the composition or rate of discharge of the

industrial wastewater discharged from CSI's industrial processing facilities into the IEUA brine line. The Project would have no effect on the capacity or permitting conditions of the IEUA industrial brine line or any other publicly owned water or wastewater treatment facilities.

f) **Less Than Significant Impact.** The one potential new employee that may be hired to manage the WWTP during the day shift would generate a minor and insignificant amount of solid waste. Approximately 100 to 700 pounds/day of biosolid waste would be generated as a by-product of the wastewater treatment process. The low end of this range would be the amount produced by treating only CSI wastewater. The higher end of the range represents the potential amount produced during a major auto-racing event at the speedway, if and when feasible, and with approval of any required regulatory utility compliance. This organic waste material would require disposal at a suitable facility that has been permitted by the Regional Water Quality Control Board to accept and utilize such wastes. Such facilities could include existing private composting and waste-to-energy facilities, as well as several County owned/operated landfills. Examples of potential private disposal facilities include the "EnerTech" waste-energy facility in Rialto, the "One-Stop" composting facility in Redlands, and the "Nursery Products" composting facility in the High Desert area. The amount of Project-generated biosolid wastes would not significantly affect the capacity or lifespan of any of these facilities.

g) **No Impact.** Construction and demolition activities could generate a variety of waste materials that may or may not require disposal. The Project would be subject to compliance with the Countywide regulations for construction and demolition ("C & D") waste diversion, which follow the standards of the California Green Building Code. These standards currently require that a minimum of 50 percent of all C & D wastes be diverted from landfill disposal, through waste reduction, recycling, or reuse measures. Compliance also includes submittal of documentation to the County, to verify that the required volumes of waste have been diverted.

As noted in the preceding response, biosolid waste generated by the Project would be hauled away to a disposal facility that has been permitted to accept such wastes. The Project would comply with applicable regulations governing such waste disposal.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVII.	**MANDATORY FINDINGS OF SIGNIFICANCE:**				
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b)	Does the project have 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)?	☐	☐	☒	☐
c)	Does the project have environmental effects, which shall cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

SUBSTANTIATION:

a) **No Impact**. As discussed in the responses to items IV a-f), the Project would not affect any plants, wildlife, or fish, or habitat supporting such biological resources. As discussed in the responses to items V a-c), the Project would not affect any historic, archaeological, or paleontological resources.

b) **Less Than Significant Impact.** As discussed throughout this Initial Study, all of the project-level impacts would be less than significant. Most impacts would be limited to the land and air space within the construction footprint that could not combine with past, present, or future effects of other projects. Emissions of air pollutants generated during construction and over the operating life of the WWTP would contribute to regional air pollutants, but would be well below SCAQMD significance thresholds, which are intended to identify cumulatively considerable air quality impacts. One additional CSI employee and one truck trip per week to haul away biosolid wastes would have a negligible effect on traffic volumes and the performance of the circulation network. Public services and recreational facilities would not be adversely affected. Levels of public services to the existing community would not be affected. No other construction is being planned at the CSI site during the same period. The Project would not result in cumulatively considerable impacts.

c) **Less Than Significant Impact**. As discussed throughout this Initial Study, the Project's environmental effects would be minor and less than significant. No substantial impacts that could adversely affect human beings have been identified.

No significant adverse impacts are identified or anticipated and no mitigation measures are required.

XVIII. MITIGATION MEASURES

(Any mitigation measures, which are not 'self-monitoring' shall have a Mitigation Monitoring and Reporting Program prepared and adopted at time of project approval)

None required.

GENERAL REFERENCES

Alquist-Priolo Special Studies Zone Act Map Series (PRC 27500)

California Department of Toxic Substances Control, Envirostor Website, July 2012.

California Department of Water Resources Bulletin #118 (Critical Regional Aquifers).

California Standard Specifications, July 1992

CEQA Guidelines, Appendix G

County Museum Archaeological Information Center

County of San Bernardino Development Code, 2007

County of San Bernardino General Plan, adopted 2007

County of San Bernardino Greenhouse Gas Emissions Reduction Plan, adopted September 2011

County of San Bernardino, Countywide Integrated Waste Management Plan.

County of San Bernardino, *San Bernardino County Stormwater Program, Model Water Quality Management Plan Guidance.*

County of San Bernardino Road Planning and Design Standards

Environmental Impact Report, San Bernardino County General Plan, 2007

Federal Emergency Management Agency Flood Insurance Rate Map and Flood Boundary Map

South Coast Air Quality Management District, CEQA Air Quality Handbook, November 1993.

South Coast Air Quality Management District, Final 2007 Air Quality Management Plan

PROJECT SPECIFIC STUDIES AND OTHER REFERENCES:

- Judy Tatman, Principal Planner, County of San Bernardino, Land Use Services Department
- Christney Barilla, Senior Planner, County of San Bernardino, Land Use Services Department
- ENVIRON, *Air Quality Report for California Steel's Proposed Wastewater Treatment Plant,* July 27, 2012. (See Attachment 1)
- John Reid, Environmental Health Specialist, County of San Bernardino, Environmental Health Department
- Erika Ellis, Recycling Specialist, County of San Bernardino, Public Works Department, Solid Waste Management Division
- County of San Bernardino, Construction and Demolition Waste Recycling Guide & Directory
- http://www.calrecycle.ca.gov/organics/biosolids - section on Biosolids under Organic Materials Management. (Accessed May 24, 2012)

ATTACHMENT 1:

CALCULATIONS OF CRITERIA AIR POLLUTANTS AND GREENHOUSE GAS EMISSIONS

ENVIRON

July 27, 2012

Air Quality Report for California Steel's Proposed Wastewater Treatment Plant

Project Understanding

ENVIRON was asked to determine the Greenhouse Gas (GHG) and Criteria Pollutant emissions associated with the construction and operation of a sanitary waste-water treatment plant located at California Steel Industries (CSI) in San Bernardino County. The project will construct a facility with a peak capacity of 130,000 gallons per day. The wastewater to be treated will be from the CSI facility and the California Speedway (Speedway). The treated water will be recycled for use at the CSI facility. Solids generated from the wastewater treatment process will be transported off-site to nearby landfills for disposal. The Criteria Pollutant and GHG emissions data presented in this report are intended to inform the environmental review associated with this project.

Construction Emissions

The construction of the project will occur primarily on an existing concrete pad and therefore will not involve significant grading during construction phases. The construction of the project is expected to occur over a three month period. The Criteria Pollutant and GHG emissions from construction will occur one-time. The Project is not phased. The Criteria Pollutant and GHG emissions come from off-road equipment used during construction and on-road mobile sources associated with workers and material hauling trucks traveling to and from the site. The methodology used to calculate these Criteria Pollutant and GHG emissions are described below.

Off-Road Equipment

The construction Criteria Pollutant and GHG emissions were calculated using California Emissions Estimator Model (CalEEMod) based on the equipment list, equipment specific working duration, weekly working schedule (i.e., Monday to Friday), and daily hours of operation (i.e., 9 hours) provided by CSI.[1] Table 1 summarizes the given off-road equipment data and ENVIRON's match to the CalEEMod™ equipment types.

[1] Provided by Mike Chu from California Steel Industries via e-mail on July 3, 2012.

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environcorp.com

Table 1. Construction Equipment List and Working Duration			
Given Equipment	**CalEEMod Equipment**	**Quantity**	**Working Duration**
Backhoe Loader or Excavators	Excavators	1	1 month
Cranes	Cranes	2	
Welders	Welders	2	
Generator	Generator Set	1	2 months
Concrete Pumper	Pumps	1	3 months[2]
Compact Equipment	Plate Compactors	1	1 week

CalEEMod default horsepower was used for the calculation. The CalEEMod default equipment load factors were adjusted down by 33% to be consistent with those used in California Air Resources Board (ARB's 2011) In-Use Off-road Equipment Inventory model.[3] ENVIRON assumed that the construction would start and end in 2013.

On-Road Mobile Source

The construction on-road mobile source Criteria Pollutant and GHG emissions from worker vehicles, concrete trucks, and delivery trucks were estimated using CalEEMod based on the number of peak daily worker trips (i.e., 10 workers, or 20 worker one-way trips per day), total concrete truck trips (i.e., 40 trucks, or 80 one-way truck trips total), and total delivery truck trips (i.e., 30 trucks, or 60 one-way truck trips total) provided by CSI. CalEEMod default trip lengths and default fleet mix for construction worker were used, and the following conservative assumptions were made in the model:

1. For worker commuting emissions, the peak daily trip number was used throughout the entire construction duration.
2. All concrete and delivery truck trips were heavy, heavy-duty trucks.

As shown in Table 2 below, the construction GHG emissions would be 80 metric tonnes of CO_2e, or 3 metric tonnes of CO_2e per year if annualized over a typical 30 year project life-time period.[4] The emissions of Criteria Pollutants from construction activities are shown in Table 3 below. The results show that the construction of the project would be below SCAQMD CEQA significance thresholds for all pollutants. GHG and Criteria Pollutant emissions are expected to be less than their respective significance thresholds.

Operational Emissions

The operational emissions from mobile source, wastewater treatment, and solid waste were calculated using CalEEMod based on the operational data provided by the CSI.[5] It was assumed that the project would not have any significant Criteria Pollutant or GHG emissions associated with landscape equipment and natural gas because the site will not be landscaped

[2] The working schedule for the concrete pumper was not provided. ENVIRON conservatively assumed that the concrete pump will be used through the entire construction duration of three months.

[3] http://www.arb.ca.gov/msei/categories.htm#offroad_motor_vehicles

[4] Draft Guidance Document - Interim CEQA Greenhouse Gas (GHG) Significance Threshold - October 2008 (page 3-8).

[5] Provided by Kevin Austin from California Steel Industries via e-mail on July 3, 2012.

and no natural gas use is anticipated In addition, it was assumed that all potential emissions associated with electricity demand was accounted for as part of the wastewater treatment process and therefore no additional electricity demands are listed under the energy use section of the model. ENVIRON assumed that the project would start operating in 2013.

Operational On-Road Mobile Sources

The indirect annual operational on-road mobile source Criteria Pollutants and GHG emissions from worker vehicles, haul trucks transporting sludge, and vendor trucks shipping in chemicals were estimated using CalEEMod based on the number of worker trips (i.e., one worker, or two worker one-way trips per day), weekly haul truck trips (i.e., one truck, or two one-way truck trips per week), and vendor truck trips (i.e., one truck, or two one-way truck trips per week) provided by the CSI. The following conservative assumptions were made in the model:

1. All vehicles were heavy, heavy-duty trucks. This is very conservative as the vehicles a worker typically drives emit less GHG emissions than a heavy, heavy-duty truck.

2. Worker trip length was identical to the truck trip length of 20 miles one-way.[6]

Operational Wastewater Treatment Plant Sources

The direct annual Criteria Pollutant and GHG emissions from the wastewater treatment plant and the indirect emissions from the electricity[7] required to operate the wastewater treatment plant were estimated using CalEEMod based on the water treatment volume and energy usage data provided by CSI.[8] The following conservative assumptions were made in the model:

1. The peak wastewater volume of 130,000 gallons per day was used for the entire year (i.e., total 43 million gallons per year). In reality, the peak volume would only occur for a short period of time a year.
2. The electricity usage for the full flow scenario was used for the entire year. The daily energy consumption is 1,360 kilowatt-hours per day. The annual usage was estimated by multiplying the daily usage by 365 days which gave 497 megawatt-hours per year. This methodology was consistent with that used by CSI for its annual operation and maintenance cost estimation.
3. The calculations assumed that the plant is 100% aerobic in design. There is not anticipated to be any digester gas and the solids will be sent to off-site landfills.
4. The calculation overestimates the amount of nitrous oxide that would be expected to occur as the calculations associated with nitrification/denitrification that typically occurs when the wastewater is released to the environment have not been removed. These emissions are not anticipated to occur since the water will be reused on-site and not released to the environment.

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[6] This assumption which is higher than the CalEEMod default value is very conservative. It was made to simplify the CalEEMod model run.

[7] Southern California Edison is the electricity provider for CSI.

[8] Provided by Kevin Austin from. California Steel Industries via e-mail on July 3, 2012.

Operational Solid Waste

The annual Criteria Pollutant and GHG emissions for sludge treatment were conservatively estimated using the peak daily value of 700 pounds per day for the entire year.[9] This assumes that sludge is broken down and converted to methane at the disposal facility. In reality, the peak value would only happen couple times a year.

As shown in Table 2 below, the annual operational GHG emissions from on-road mobile sources, solid waste, and wastewater treatment would be 34, 58, and 155 metric tonnes of CO_2e per year, respectively. Table 3 shows that operational Criteria Pollutant emissions would be less than SCAQMD significance thresholds.

Combined Emissions

The combined Criteria Pollutant and GHG emissions from both construction and operation of the project are summarized in Tables 2 and 3 below. As shown in Table 2, even with all the conservative assumptions made during the emissions calculation, the annual GHG emissions from the project would be well below the San Bernardino County Development Review adopted significance threshold of 3,000 metric tonnes of CO_2e per year for development projects.[10] Therefore, no further analysis or mitigation is necessary.

Criteria Pollutant emissions for all pollutants for both construction and operation are below the SCAQMD Air Quality Significance Thresholds for both construction and operation[11]. Therefore, no further analysis or mitigation is necessary.

Table 2. Combined Construction and Operational GHG Emissions

Emissions Category		2013 Project Emissions
		MT CO2e/year
Construction Emissions	Construction	*80*
	*Annualized Construction Emissions	3
Operational Emissions	Mobile Sources	34
	Solid Waste	58
	Wastewater Treatment	171
Total		**266**
San Bernardino County GHG Threshold		**3,000**
Exceeds San Bernardino County GHG Threshold?		**No**

*Per SCAQMD Guidance Construction emissions are annualized over 30 years.

[9] Based on the call with California Steel Industries on July 3, 2012.

[10] GHG Development Review Processes, County of San Bernardino, August 2011

[11] http://www.aqmd.gov/ceqa/handbook/signthres.pdf (March 2011)

Table 3. Construction and Operational Criteria Pollutant Emissions						
Emission Category (lbs/day)	**NOx**	**VOC**	**PM10**	**PM2.5**	**SOx**	**CO**
Construction	**13.1**	**2.2**	**3.3**	**0.9**	**0.0**	**10.7**
SCAQMD Threshold	100	75	150	55	150	550
Exceeds Threshold?	No	No	No	No	No	No
Operation	**1.4**	**0.1**	**0.1**	**0.05**	**0.0**	**0.7**
SCAQMD Threshold	55	55	150	55	150	550
Exceeds Threshold?	No	No	No	No	No	No

CalEEMod Version: CalEEMod.2011.1.1 Date: 7/19/2012

WWTP

San Bernardino-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
User Defined Industrial	1	User Defined Unit

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.2	**Utility Company**	Southern California Edison
Climate Zone	10	**Precipitation Freq (Days)**	32		

1.3 User Entered Comments

Project Characteristics -

Land Use - Not Used

Construction Phase - Phases are created by use of construction equipment

Off-road Equipment - Equipment that will be used for 1 month. LF reduced by 33%.

Off-road Equipment - Equipment that will be used for 2 months. LF reduced by 33%.

Off-road Equipment - Equipment that will be used for 3 months. LF reduced by 33%.

Off-road Equipment - Equipment that will be used for 1 week. LF reduced by 33%.

Trips and VMT - 10 workers per day (20 round trips per day). Total 40 concrete trucks (80 round trips). Total 30 delivery trucks (60 round trips).

Vehicle Trips - 1 worker per day for 7 days a week (2 trips per day). 1 weekly haul truck and 1 weekly vendor truck (4 weekly truck trips). Assume trip length = 20 miles and 100% primary trips.

Vechicle Emission Factors - Assume 100% HHDT.

Vechicle Emission Factors - Assume 100% HHDT.

Vechicle Emission Factors - Assume 100% HHDT.

Water And Wastewater - 130,000 gals of wastewater per day for 365 days. Assume 100% Aerobic. Electricty needed for wastewater treatment are give.

Solid Waste - 700lb per day for 365 days. 700 lbs per day x 365 days per year / 2000 lbs per ton = 127.75 tons per year

Construction Off-road Equipment Mitigation -

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2013	0.10	0.59	0.48	0.00	0.11	0.04	0.15	0.00	0.04	0.04	0.00	80.07	80.07	0.01	0.00	80.24
Total	**0.10**	**0.59**	**0.48**	**0.00**	**0.11**	**0.04**	**0.15**	**0.00**	**0.04**	**0.04**	**0.00**	**80.07**	**80.07**	**0.01**	**0.00**	**80.24**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2013	0.10	0.59	0.48	0.00	0.11	0.04	0.15	0.00	0.04	0.04	0.00	80.07	80.07	0.01	0.00	80.24
Total	**0.10**	**0.59**	**0.48**	**0.00**	**0.11**	**0.04**	**0.15**	**0.00**	**0.04**	**0.04**	**0.00**	**80.07**	**80.07**	**0.01**	**0.00**	**80.24**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.02	0.25	0.12	0.00	0.01	0.01	0.02	0.00	0.01	0.01	0.00	34.27	34.27	0.00	0.00	34.29
Waste						0.00	0.00		0.00	0.00	25.93	0.00	25.93	1.53	0.00	58.12
Water						0.00	0.00		0.00	0.00	0.00	159.09	159.09	0.01	0.04	171.22
Total	**0.02**	**0.25**	**0.12**	**0.00**	**0.01**	**0.01**	**0.02**	**0.00**	**0.01**	**0.01**	**25.93**	**193.36**	**219.29**	**1.54**	**0.04**	**263.63**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.02	0.25	0.12	0.00	0.01	0.01	0.02	0.00	0.01	0.01	0.00	34.27	34.27	0.00	0.00	34.29
Waste						0.00	0.00		0.00	0.00	25.93	0.00	25.93	1.53	0.00	58.12
Water						0.00	0.00		0.00	0.00	0.00	159.09	159.09	0.01	0.04	171.22
Total	**0.02**	**0.25**	**0.12**	**0.00**	**0.01**	**0.01**	**0.02**	**0.00**	**0.01**	**0.01**	**25.93**	**193.36**	**219.29**	**1.54**	**0.04**	**263.63**

3.0 Construction Detail

3.1 Mitigation Measures Construction

Clean Paved Roads

3.2 Building Construction 1 - 2013

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.04	0.23	0.12	0.00		0.01	0.01		0.01	0.01	0.00	24.43	24.43	0.00	0.00	24.49
Total	**0.04**	**0.23**	**0.12**	**0.00**		**0.01**	**0.01**		**0.01**	**0.01**	**0.00**	**24.43**	**24.43**	**0.00**	**0.00**	**24.49**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker	0.00	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.23	3.23	0.00	0.00	3.23
Total	**0.00**	**0.00**	**0.02**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.23**	**3.23**	**0.00**	**0.00**	**3.23**

3.2 Building Construction 1 - 2013

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.04	0.23	0.12	0.00		0.01	0.01		0.01	0.01	0.00	24.43	24.43	0.00	0.00	24.49
Total	**0.04**	**0.23**	**0.12**	**0.00**		**0.01**	**0.01**		**0.01**	**0.01**	**0.00**	**24.43**	**24.43**	**0.00**	**0.00**	**24.49**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker	0.00	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.23	3.23	0.00	0.00	3.23
Total	**0.00**	**0.00**	**0.02**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.23**	**3.23**	**0.00**	**0.00**	**3.23**

3.3 Building Construction 2 - 2013

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.01	0.10	0.06	0.00		0.01	0.01		0.01	0.01	0.00	9.23	9.23	0.00	0.00	9.25
Total	**0.01**	**0.10**	**0.06**	**0.00**		**0.01**	**0.01**		**0.01**	**0.01**	**0.00**	**9.23**	**9.23**	**0.00**	**0.00**	**9.25**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker	0.00	0.00	0.04	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.00	6.03	6.03	0.00	0.00	6.04
Total	**0.00**	**0.00**	**0.04**	**0.00**	**0.01**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**6.03**	**6.03**	**0.00**	**0.00**	**6.04**

3.3 Building Construction 2 - 2013

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.01	0.10	0.06	0.00		0.01	0.01		0.01	0.01	0.00	9.23	9.23	0.00	0.00	9.25
Total	**0.01**	**0.10**	**0.06**	**0.00**		**0.01**	**0.01**		**0.01**	**0.01**	**0.00**	**9.23**	**9.23**	**0.00**	**0.00**	**9.25**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker	0.00	0.00	0.04	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.00	6.03	6.03	0.00	0.00	6.04
Total	**0.00**	**0.00**	**0.04**	**0.00**	**0.01**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**6.03**	**6.03**	**0.00**	**0.00**	**6.04**

3.4 Building Construction 3 - 2013

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.03	0.20	0.13	0.00		0.02	0.02		0.02	0.02	0.00	18.88	18.88	0.00	0.00	18.93
Total	**0.03**	**0.20**	**0.13**	**0.00**		**0.02**	**0.02**		**0.02**	**0.02**	**0.00**	**18.88**	**18.88**	**0.00**	**0.00**	**18.93**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.00	0.02	0.01	0.00	0.07	0.00	0.07	0.00	0.00	0.00	0.00	2.96	2.96	0.00	0.00	2.96
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker	0.01	0.01	0.08	0.00	0.02	0.00	0.02	0.00	0.00	0.00	0.00	12.34	12.34	0.00	0.00	12.36
Total	**0.01**	**0.03**	**0.09**	**0.00**	**0.09**	**0.00**	**0.09**	**0.00**	**0.00**	**0.00**	**0.00**	**15.30**	**15.30**	**0.00**	**0.00**	**15.32**

3.4 Building Construction 3 - 2013

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.03	0.20	0.13	0.00		0.02	0.02		0.02	0.02	0.00	18.88	18.88	0.00	0.00	18.93
Total	**0.03**	**0.20**	**0.13**	**0.00**		**0.02**	**0.02**		**0.02**	**0.02**	**0.00**	**18.88**	**18.88**	**0.00**	**0.00**	**18.93**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.00	0.02	0.01	0.00	0.07	0.00	0.07	0.00	0.00	0.00	0.00	2.96	2.96	0.00	0.00	2.96
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker	0.01	0.01	0.08	0.00	0.02	0.00	0.02	0.00	0.00	0.00	0.00	12.34	12.34	0.00	0.00	12.36
Total	**0.01**	**0.03**	**0.09**	**0.00**	**0.09**	**0.00**	**0.09**	**0.00**	**0.00**	**0.00**	**0.00**	**15.30**	**15.30**	**0.00**	**0.00**	**15.32**

3.5 Building Construction 4 - 2013

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.06	0.06	0.00	0.00	0.06
Total	**0.00**	**0.00**	**0.00**	**0.00**		**0.00**	**0.00**		**0.00**	**0.00**	**0.00**	**0.06**	**0.06**	**0.00**	**0.00**	**0.06**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.00	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.22	2.22	0.00	0.00	2.22
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.70	0.70	0.00	0.00	0.70
Total	**0.00**	**0.02**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2.92**	**2.92**	**0.00**	**0.00**	**2.92**

3.5 Building Construction 4 - 2013

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.06	0.06	0.00	0.00	0.06
Total	**0.00**	**0.00**	**0.00**	**0.00**		**0.00**	**0.00**		**0.00**	**0.00**	**0.00**	**0.06**	**0.06**	**0.00**	**0.00**	**0.06**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.00	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.22	2.22	0.00	0.00	2.22
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.70	0.70	0.00	0.00	0.70
Total	**0.00**	**0.02**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2.92**	**2.92**	**0.00**	**0.00**	**2.92**

4.0 Mobile Detail

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.02	0.25	0.12	0.00	0.01	0.01	0.02	0.00	0.01	0.01	0.00	34.27	34.27	0.00	0.00	34.29
Unmitigated	0.02	0.25	0.12	0.00	0.01	0.01	0.02	0.00	0.01	0.01	0.00	34.27	34.27	0.00	0.00	34.29
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	2.00	4.00	4.00	18,720	18,720
Total	2.00	4.00	4.00	18,720	18,720

4.3 Trip Type Information

	Miles			Trip %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW
User Defined Industrial	20.00	15.40	9.60	100.00	0.00	0.00

5.0 Energy Detail

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Electricity Unmitigated						0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NaturalGas Mitigated	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NaturalGas Unmitigated	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
User Defined Industrial	0	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total		**0.00**	**0.00**	**0.00**	**0.00**		**0.00**	**0.00**		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
User Defined Industrial	0	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total		**0.00**	**0.00**	**0.00**	**0.00**		**0.00**	**0.00**		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
User Defined Industrial	0					0.00	0.00	0.00	0.00
Total						**0.00**	**0.00**	**0.00**	**0.00**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
User Defined Industrial	0					0.00	0.00	0.00	0.00
Total						**0.00**	**0.00**	**0.00**	**0.00**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unmitigated	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.00					0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products	0.00					0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Landscaping	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**0.00**	**0.00**	**0.00**	**0.00**		**0.00**	**0.00**		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.00					0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products	0.00					0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Landscaping	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**0.00**	**0.00**	**0.00**	**0.00**		**0.00**	**0.00**		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

7.0 Water Detail

7.1 Mitigation Measures Water

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr				MT/yr			
Mitigated					159.09	0.01	0.04	171.22
Unmitigated					159.09	0.01	0.04	171.22
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
User Defined Industrial	47.45 / 0					159.09	0.01	0.04	171.22
Total						**159.09**	**0.01**	**0.04**	**171.22**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
User Defined Industrial	47.45 / 0					159.09	0.01	0.04	171.22
Total						**159.09**	**0.01**	**0.04**	**171.22**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
	tons/yr				MT/yr			
Mitigated					25.93	1.53	0.00	58.12
Unmitigated					25.93	1.53	0.00	58.12
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
User Defined Industrial	127.75					25.93	1.53	0.00	58.12
Total						**25.93**	**1.53**	**0.00**	**58.12**

Mitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
User Defined Industrial	127.75					25.93	1.53	0.00	58.12
Total						**25.93**	**1.53**	**0.00**	**58.12**

9.0 Vegetation