

APPENDIX 8.1F

Cumulative Impact Analysis

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The CEC AFC process requires an air quality impact analysis of proposed and new air pollutant emitting equipment located within 6 miles (10 kilometers) of the proposed VPP. The background behind this requirement is that emissions from these new projects are not reflected in current ambient air quality readings measured at nearby ambient air quality monitoring stations. Impacts from projects that could affect background air quality are to be assessed to provide a more complete picture of background air quality without the project proposed in the AFC.

In addition to the listing derived from the SCAQMD permitting files, a review of the SCAQMD's CEQA projects was conducted for any projects within 6 miles of the VPP project site. Additionally, a review of the City of Vernon, Los Angeles, and the County of Los Angeles planning departments did not identify any Notices of Preparation for projects that would be expected to emit significant operational emissions (refineries, power plants, engine generators, etc.).

Permitted Sources

To begin the process of identifying potential sources to incorporate into the cumulative air quality analysis, the Application contacted the SCAQMD with a list of zip codes within 6 miles of the project site. This list was transmitted to the CEC for review. The CEC removed sources from the list based on distance from VPP (greater than 6 miles), magnitude of emissions expected, and source type. The CEC provided the revised list to VPP, which conducted research into the permitting actions ongoing with the SCAQMD. After this research was completed, this list was provided to the CEC via email (February 8, 2006) for discussion purposed. The CEC staff removed several sources, but added six other sources on during a February 8, 2006 phone conversation. The resulting sources were plotted using GIS to determine the distance between these sources and VPP (Figure 8.1F-1). Additional information on these sources will be acquired from the SCAQMD for use in the cumulative impact assessment. The Applicant submitted air dispersion modeling protocol to the CEC previously, which included the methodology proposed for performing the cumulative impact assessment.

Working from the projects identified by CEC staff, contact was made with the applicable SCAQMD permit processing engineer for each recently permitted or proposed project. Following are the results of that investigation.

- 1. Fortfiber Corporation, 4489 Bandini Boulevard, Los Angeles 90023-4777, Application Number 438308** – This source is a 6.246 MMBtu/hr oil heater with 18 burners, each rated at 0.347 MMBtu/hr. In the application the unit is identified as having a NO_x emissions concentration of 20 ppmv.

2. **NP Cogen, Inc., 5605 East 61st Street, Los Angeles 90040-3407, Application Number 445640** – This source is a new 1,500-hp lean burn JESAG IC engine, equipped with SCR. Permit review is not complete, but the engine may meet a NO_x mass emissions limit of 0.15 gr/bhp-hr.
3. **University of Southern California, 3651 Watt Way, Los Angeles 90089-0021, Application Numbers 445943 and 445943** – These sources are two 5.7 MMBtu/hr natural gas-fired Parker Boilers that will be limited through permit condition to 12 ppmv NO_x and 50 ppmv CO. There will be no other permit conditions anticipated that will limit operations of these units.
4. **US Garment, Inc., 4440 East 26th Street, Los Angeles 90023, Application Number 448300** – This source is a 12 MMBtu/hr natural gas-fired water heater, equipped with 2 burners. The NO_x concentration limit is expected to be 12 ppmv and a CO limit of 400 ppmv. The permit is conditioned to a gas usage limit of 8.32 MMscf in any month.
5. **Atlas Carpet Mills Inc., 340 S Avenue, 17, Los Angeles 90031, Application Number 446799** – This source is a 5-20 MMBtu/hr natural gas-fired boiler. The expected NO_x concentration limit is 12 ppmv and a CO limit of 50 ppmv. Additional information will be submitted when received by from the SCAQMD.
6. **Universal Molding Company, 10806 Stanford Avenue, Lynwood, 90262, Application Numbers 446374 and 446375** – Additional information will be submitted when received by from the SCAQMD.
7. **Swisstex California Inc., 13660 Figueroa, Los Angeles 90061, Application Numbers 4300822 and 4442567** – Based on the distance of this facility from the VPP project, the source is outside the 6-mile radius.
8. **Los Angeles County Metropolitan Transportation Authority, One Gateway Plaza, Los Angeles 90012, Application Numbers 446379 and 446380** – This source is comprised of two 5-20 MMBtu/hr natural gas-fired boilers. The expected NO_x concentration limit is 12 ppmv and a CO limit of 50 ppmv. Additional information will be submitted when received by from the SCAQMD.

CEQA Documents

The Applicant also contacted the SCAQMD to review if any SCAQMD CEQA projects were being prepared or certified for projects within 6 miles of the VPP project site. The SCAQMD responded that two EIRs. The first project is the Chevron USA facility EIR where Chevron proposes to blend ethanol as a replacement for methyl tertiary butyl ether, which is currently the only permissible oxygenate that can be used, into the gasoline. Chevron's project consist of modifications and additions to existing refinery process units, construction of new equipment, and construction of railcar storage facilities within existing refinery boundaries, as well as modifications and additions at the terminals to blend and store ethanol. The Chevron refinery is located 12 miles from the VPP project site and is not considered for the VPP impact analysis. The terminals identified in the EIR are the Montebello Terminal (601 South Vail Avenue in the City of Montebello), the Van Nuys Terminal (15359 Oxnard Street in the Van Nuys/Sherman Oaks area of the City of Los Angeles, and the Huntington

Beach Terminal (17881 Gothard Street in the City of Huntington Beach). The closest of these terminals is the Montebello terminal, which is 6.2 miles from the project site. The proposed work on the Montebello terminal includes the following.

- A new 50,000-bbl ethanol storage tank, with trunk unloading equipment consisting of two new pumps and grounding systems and associated piping and hoses, two new concrete pads, each 12 feet by 70 feet, for containment and drainage, a new card reader and touchscreen at unloading area.
- A new rail spur for ethanol railcar unloading, two new pumps and 12 new hoses manifolded for simultaneous unloading of 12 rail cars, new piping from the unloading pumps to the new storage tank.
- Two new pumps and associated filters and piping for ethanol blending, and new meters and control valves to provide ratio on rack ethanol blending at loading rack.
- Two new pumps and associated filters and piping associated with off rack ethanol blending.

The other project is the Mobil EIR to modify its refinery operations to comply with the requirements of the new CARB Phase 3 reformulated gasoline specifications and an Executive Order to remove MTBE from gasoline sold in the state. The Mobil project involves modifications and additions at the Torrance Refinery and modifications and additions at three distribution terminals.

Mobil's Torrance Refinery is located at 3700 West 190th Street, in the City of Torrance. The refinery is approximately 11 miles from the VPP site and is outside 6 mile distance for stationary sources required to be included in the CEC cumulative impact analysis.

The three terminals are the Vernon Terminal located at 2709 East 37th Street in the City of Vernon, the Atwood Terminal located at 1477 Jefferson Street in the City of Anaheim, and the Southwest Terminal located at 799 South Seaside Avenue on Terminal Island in the Port of Los Angeles. The Vernon Terminal is approximately 0.8 miles from the VPP project site, with the Atwood and Southwest Terminals located approximately 24 and 24 miles from the project site respectively. The EIR identifies the following modifications to the Vernon Terminal.

- Conversion of two existing gasoline storage tanks (20,000 and 60,000-bbl) to store fuel ethanol
- Installation of new 50,000-bbl tank to store gasoline
- Modification of a rail spur to include a new fuel ethanol unloading rack
- Construction of a new fuel ethanol tanker truck loading lane at an existing loading rack
- Construction of a new fuel ethanol tanker truck unloading rack
- Modifications to an existing tanker truck loading rack for fuel ethanol blending

