

APPENDIX 5.1F

# Cumulative Impacts Analysis for the CPVVS Facility

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### **CUMULATIVE IMPACTS ANALYSIS FOR THE CPVVS FACILITY**

Cumulative air quality impacts from the CPV Vaca Station (CPVVS) and other reasonably foreseeable projects are both regional and localized in nature. Regional air quality impacts are possible for pollutants such as ozone, which is formed through a photochemical process that can take hours to occur. Carbon monoxide, NO<sub>x</sub>, and SO<sub>x</sub> impacts are generally localized in the area in which they are emitted. PM<sub>10</sub> can create a local air quality problem in the vicinity of its emission source, but can also be a regional issue when it is formed in the atmosphere from ROC, SO<sub>x</sub>, and NO<sub>x</sub>.

The cumulative impacts analysis will consider the potential for both regional and localized impacts due to emissions from proposed operation of CPVVS. Regional impacts will be evaluated by comparing maximum daily and annual emissions from CPVVS with emissions of ozone and PM<sub>10</sub> precursors in both YSAQMD. Localized impacts will be evaluated by looking at other local sources of pollutants that are not included in the background air quality data to determine whether these sources in combination with CPVVS would be expected to cause significant cumulative air quality impacts.

For each criteria pollutant, facilities having an emission increase of less than five tons per year will be considered de minimis, and such facilities will be excluded. Both YSAQMD and BAAQMD have been requested to provide information on any sources that might be appropriate for a cumulative air quality impact analysis: other stationary source emissions sources within a six-mile radius that have received construction permits but are not yet operating, or are in the permitting process.

Upon receipt of sufficient information from the District to allow air dispersion modeling of the non-project sources to be included in the cumulative air quality impact analysis, stationary sources whose impacts should be considered but are not included in ambient data will be identified, in consultation with CEC staff. AERMOD will be used in a procedure similar to that described in the modeling protocol that was submitted to the agencies for this project.