BAY AREA AIR QUALITY MANAGEMENT DISTRICT
939 ELLIS STREET
SAN FRANCISCO, CA 94109

CEQA INITIAL STUDY

BACKGROUND

Project

BAAQMD Regulation 8, Rule 5: Storage of Organic Liquids

Lead Agency

Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Contact Person

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Project Location

This rule applies within the area covered by the Bay Area Air Quality Management District. The District includes all of seven counties - Alameda, Contra Costa, Marin, San Francisco, San Mateo, Santa Clara, and Napa - and portions of two others - southwestern Solano and southern Sonoma.

Project Description

Organic liquid storage tanks in the Bay Area are regulated by BAAQMD Regulation 8, Rule 5, which specifies design performance criteria for storage tanks. The rule was originally adopted in 1978 and has been amended a number of times, most recently in 1993. The rule affects petroleum refineries, chemical plants, gasoline bulk terminals and some other industries that store significant amount of organic liquids.

The proposed amendments to Regulation 8, Rule 5 will implement control measure SS-07 from the District's 1999 Ozone Attainment Plan. The amendments will require slotted guidepoles in organic liquid storage tanks to be fitted with gaskets, wipers, and pole sleeves to minimize evaporative emissions. Operators seeking an exemption to take tanks out of service for preventative maintenance will be required to provide written certification of compliance and to

minimize emissions during the exemption period. Also, the minimum required extension for metallic shoe type seals in internal floating roof tanks will be changed, and new definitions related to the slotted guidepole requirements will be added.

Emission reductions from the amendments, which will go into effect by June 2000, are estimated to be 0.87 tons/day. To achieve these emission reductions, approximately 200 organic liquid storage tanks in the Bay Area will need to be retrofitted with vapor control devices.

Environmental Setting

The BAAQMD is classified as a nonattainment area for the California and federal ambient air quality standards for ozone. Ozone is formed from the reaction of oxides of nitrogen (NOx) and precursor organic vapors in the presence of sunlight. The environmental setting for this rule is fully described in the final EIR prepared for the Bay Area 1991 Clean Air Plan. For a discussion of Bay Area ozone trends, see the San Francisco Bay Area Ozone Attainment Plan, adopted by the BAAQMD Board of Directors in June, 1999.

Other Approvals Required

None

Environmental Factors Potentially Affected

A check beside an impact category below indicates that, for the category, this project involves at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

_____ Aesthetics	_____ Agriculture Resources	_____ Air Quality
_____ Biological Resources	_____ Cultural Resources	_____ Geology / Soils
_____ Hazards/Hazardous Mat'l	_____ Hydrology/Water Quality	_____ Land Use/Planning
_____ Mineral Resources	_____ Noise	_____ Population/Housing
_____ Public Services	_____ Recreation	_____ Transportation/Traffic
_____ Utilities/Service Systems	_____ Mandatory Findings of Significance	
___X___ No Potentially Significant Impacts		

DETERMINATION

On the basis of this initial evaluation:

__X__ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

_____ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

_____ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

_____ I find 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.

_____ I find that, although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (1) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures from the EIR that are imposed upon the proposed project.

_____ _____

Bob Nishimura Date

Supervising Air Quality Engineer

ENVIRONMENTAL IMPACT CHECKLIST

(Note: All answers are explained on attached sheets.)

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
1. Aesthetics. Would the proposal:				
a. Have a substantial adverse effect on a scenic vista?	_____	_____	_____	X
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	_____	_____	_____	X
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	_____	_____	_____	X
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	_____	_____	_____	X
2. Agriculture Resources. Would the proposal:				
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?	_____	_____	_____	X
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	_____	_____	_____	X
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	_____	_____	_____	X
3. Air Quality. Would the proposal:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	_____	_____	_____	X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				X
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)?				X
d. Expose sensitive receptors to substantial pollutant concentrations?				X
e. Create objectionable odors affecting a substantial number of people?				X
4. Biological Resources. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, 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?				X
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
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?				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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?				X
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X
5. Cultural Resources. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?				X
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				X
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
d. Disturb any human remains, including those interred outside of formal cemeteries?				X
6. Geologic and Soils. Would the project:				
a. Expose people or structure to potential substantial adverse effects, including the risk of loss, injury, or death involving:				X
i. Rupture of known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to the Division of Mines and Geology Special Publication 42)				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?				X
iii. Seismic-related ground failure, including liquefaction?				X
iv. Landslides?				X
b. Result in substantial soil erosion or the loss of topsoil?				X
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?				X
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				X
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X

7. 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?				X
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?				X
c. Emit hazardous materials or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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 create a significant hazard to the public or the environment?	_____	_____	_____	X
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?	_____	_____	_____	X
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?	_____	_____	_____	X
g. Impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	_____	_____	_____	X
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?	_____	_____	_____	X
8. Hydrology and Water Quality. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	_____	_____	_____	X
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net reduction 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)?	_____	_____	_____	X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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 which would result in substantial erosion or siltation on- or off-site?	_____	_____	_____	X
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 off-site?	_____	_____	_____	X
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	_____	_____	_____	X
f. Otherwise substantially degrade water quality?	_____	_____	_____	X
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?	_____	_____	_____	X
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	_____	_____	_____	X
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?	_____	_____	_____	X
j. Inundation by seiche, tsumani, or mudflow?	_____	_____	_____	X
9. Land Use and Planning. Would the project:				
a. Physically divide an established community?	_____	_____	_____	X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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?	_____	_____	_____	X
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	_____	_____	_____	X
10. Energy and 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?	_____	_____	_____	X
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?	_____	_____	_____	X
11. 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?	_____	_____	_____	X
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	_____	_____	_____	X
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	_____	_____	_____	X
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	_____	_____	_____	X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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?	_____	_____	_____	X
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?	_____	_____	_____	X
12. Population and Housing. Would the project:				
a. Induce substantial 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)?	_____	_____	_____	X
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	_____	_____	_____	X
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	_____	_____	_____	X
13. Public Services. For any of the following public services, would the project require the construction of new or physically-altered governmental facilities to maintain acceptable service ratios, response times, or other performance objectives, thereby producing significant environmental impacts:				
a. Fire protection?	_____	_____	_____	X
b. Police protection?	_____	_____	_____	X
c. Schools?	_____	_____	_____	X
d. Parks?	_____	_____	_____	X
e. Other public facilities?	_____	_____	_____	X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
14. 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?				X
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?				X
15. Transportation and Traffic. Would the project:				
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?				X
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?				X
c. Produce a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersection) or incompatible uses (e.g., farm equipment)?				X
e. Result in inadequate emergency access?				X
f. Result in inadequate parking capacity?				X
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
16. Utilities and Service Systems. Would the project:				
a. Exceed the wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
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?				X
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?				X
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
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?				X
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X
g. Comply with federal, state, and local statutes and regulations related to solid waste?				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
17. 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?	_____	_____	_____	X
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.)	_____	_____	_____	X
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	_____	_____	_____	X

DISCUSSION OF ENVIRONMENTAL IMPACTS

Proposed Amendments to Regulation 8, Rule: 5: Storage of Organic Liquids

Introduction

This section of the Initial Study explains the reasons for checking the particular items checked in the checklist. Explanations are provided both for those items involving some potential impact and those for which no impact is anticipated.

Background

The proposed amendments to Regulation 8, Rule 5: Storage of Organic Liquids will require the installation of additional seals for slotted guide poles on some external floating roof tanks. A floating roof tank has a roof that floats on the surface of the organic liquid contained in the tank. As a result, there is no vapor space above the liquid surface as there is with a conventional fixed roof tank. With no vapor space, there is little opportunity for the liquid to evaporate and generate organic vapor emissions. However, some of these tanks have slotted guide poles to guide the roof in its rise and fall and to prevent roof rotation. The slots or holes provide an opening that allows the operator to see the liquid surface and take samples. But they also provide a path for vapors to escape the tank. Hydrocarbon emissions from slotted guide poles are significant, especially when wind movement through the slots creates a pressure differential that draws organic gases out of the tank. The proposed amendments require the use of gaskets, wipers, and pole sleeves to minimize evaporation. Retrofit kits are readily available which will significantly reduce emissions and can be installed without taking a tank out of service.

The average emission reduction from an external floating roof tank with slotted guidepoles is estimated to be 3200 pounds of organic vapors per year per affected tank, based on a 10 mile per hour wind and storage of high vapor pressure gasoline or crude oil. The proposed amendments will require approximately 200 tanks in the District to be retrofitted. The total expected emission reduction from the new requirements is 0.87 ton of reactive organic compounds per day.

The storage tanks affected by this rule already exist. These amendments will not require any new storage tanks to be built, although new tanks may be added simply because of projected demand for petroleum and chemical products. The tanks are located at existing industrial facilities, petroleum refineries, chemical plants, gasoline bulk distribution terminals, and at some additional facilities that use tanks for storage of large amounts of organic liquids used in manufacturing processes.

1. Aesthetics

The addition of gaskets, wipers, and pole sleeves to an existing tank would not affect the appearance of a tank. A tank's profile would be unchanged, and there would be no impact on the skyline.

In addition, the proposal would not result in any new tanks. Because the proposal will not alter the appearance of existing tanks or cause any new tanks or facilities to be built, no damage to any scenic resources, damage to the visual character or aesthetic quality of any site, or creation of new light or glare is expected.

2. Agriculture Resources

The existing facilities and tanks are already located in industrial areas. The proposal will not require any expansion of existing facilities that may impact agricultural areas. No impacts on any agricultural resources are expected.

3. Air Quality

Facilities are expected to comply with the proposed amendments to Rule 5 by installing gaskets, wipers, and pole sleeves to minimize evaporation of fugitive emissions from organic liquids that escape through slotted guide poles. This will prevent the escape of emissions and, as a result, the amendments are not expected to result in the installation of any abatement technologies such as incineration or carbon adsorption. Because emissions will be prevented from escaping rather than treated after escape, there is no potential for transfer of emissions to other media such as water or for the creation of other emissions through combustion. The sole impact of the amendments on air quality is expected to be a beneficial reduction in emissions of reactive organic compounds.

The projected emission reductions contained in this proposal are part of the 1997 Bay Area Clean Air Plan and the 1999 Bay Area Ozone Attainment Plan. They will help prevent a violation of any air quality standard. There is no possibility that there could be an increase in emissions to any receptor population as result of these rule changes. The amendments may help relieve objectionable odors from the atmosphere and do not have the possibility of causing any additional odors.

4. Biological Resources

Biological resources will be unaffected by this proposal. Any installation of equipment would occur at existing industrial facilities. For this reason, there will be no potential to impact any wildlife habitat, no potential to disrupt any riparian or other natural community, and no potential to affect any wetland. Because the

proposal does not require any new construction of tanks or movement of any existing tanks, there is no possibility of disruption to any migration patterns. There are no local ordinances that are designed to protect biological resources that would be affected by this proposal, nor are there any state, regional or local habitat plans that would be affected.

5. Cultural Resources

The facilities affected by this proposal are existing industrial facilities. Although some equipment is likely to be installed in existing tanks in existing facilities, there is no potential impact to any historical, archaeological or paleontological resources. Any potential construction would not disrupt any human remains.

6. Geology and Soils

This proposal will not cause the relocation of facilities or tanks. As a result, no geological or soil impacts are expected. If any of the facilities affected by this proposal, such as petroleum refineries or gasoline bulk terminals, are located on unstable soils or seismically active faults, there is a possibility of harm to the public from earthquakes, landslides, soil liquefaction or expansion. However, the proposed amendments in no way change any of these potential risks. There is no possibility that this proposal will create any loss of topsoil or soil erosion. The proposal will not generate any waste, so there will be no need for any additional septic systems or below ground wastewater piping which could be disrupted by seismic instability.

7. Hazards and Hazardous Materials

The proposal will reduce the generation of organic vapors. No treatment of vapors is expected and no transfer of organic emissions to other media such as water is expected. There is no possibility that the proposal will increase the generation of hazardous material or increase any hazards.

The amendments to Rule 5 will affect existing tanks at industrial facilities. To the extent that any emissions from these tanks are hazardous, the proposed rule amendments should reduce these hazards. The rule will not increase the number or capacity of these tanks. There is therefore no potential for any increase in hazardous material impacts on schools or the public. There is no potential for any increased safety risk for any airport, public or private, nor any impact on any airport land use plan. The proposed amendments to Rule 5 will not affect any existing or proposed emergency response plan.

8. Hydrology and Water Quality

The amendments have no potential to affect water quality. The proposal will not require any water usage to implement, will not result in any increase in wastewater, and will not transfer air emissions to water. Consequently, there is no possibility for violations of water quality standards, changes in groundwater supplies, changes in drainage patterns, changes in the quality of runoff water, or chance that water quality will in any way be degraded. The proposal affects existing facilities and therefore does not have any potential to impact housing siting in relation to flood plains or to redirect any flood waters to impact existing housing. There is no potential for the project to increase risk from seiche, tsunami or mudslides.

9. Land Use and Planning

The proposal will only affect storage tanks in existing facilities that are zoned appropriately for their activities: petroleum refining, gasoline distribution, chemical synthesis, and manufacturing processes. Consequently, the proposal has no potential to divide existing communities, to cause any alteration in or conflict with any land use plan, policy or regulation, or to interfere with any habitat conservation plan.

10. Mineral Resources

The only impact of the proposed amendments is to reduce the evaporation of organic liquids from some existing storage tanks. The amendments will not result in the use of any mineral resource and could not cause any loss of availability of a mineral resource. In addition, the proposal could not result in any loss of availability of a mineral resource recovery site.

11. Noise

The project affects industrial facilities that may already have elevated noise levels. However, the proposed amendments will not result in any noise increase. Consequently, there is no potential for the project to increase noise levels above any standards, to increase groundborne noise or vibration, or to increase permanent, temporary, or periodic noise levels. The project will have no impact on noise levels associated with any public or private airport or airport use plan.

12. Population and Housing

The proposed amendments to Rule 5 affect only existing industrial facilities. Their implementation will not require any significant increase in staff at the affected facilities or elsewhere. The rule will not increase the number of organic liquid storage tanks The project will not result in an increase in population, will

not induce population growth, and will not displace any existing housing or people, regardless of their present proximity to the tanks.

13. Public Services

The project only affects existing facilities. Increased control of organic vapors from storage tanks may result in lower potential for explosions or fires. As a result, there may be less potential demand for safety related public services associated with significant incidents. The affected facilities are subject to numerous fire and safety regulations, and often have safety and fire personnel on site. The project does not have the potential to have any impact on public services by causing the construction of new facilities, altering service ratios, or changing response times of police, fire or emergency response personnel. There is no potential impact on usage of schools, parks, or other public services.

14. Recreation

The project affects only existing industrial facilities. Although compliance with the proposed amendments is likely to require the installation of some equipment, it is not expected to result in the addition of any permanent personnel to affected facilities. No increase in use of an existing recreational facility or park is expected. The proposal will not result in a need to create new parks or recreational facilities.

15. Transportation and Traffic

The project will not require the addition of any tanks at existing facilities or cause any new facilities to be built. There may be some construction to retrofit tanks with gaskets and other equipment. However, any increase in local traffic caused by an increase in the number of personnel at an existing facility would be temporary and would be insignificant. Because affected facilities are located near major traffic arteries, no impact from increased traffic in relation to the existing traffic load and capacity of the street system is expected. There is no possibility of an impact to the level of service standard established by a local congestion management agency. There is no possibility of an impact to a local air traffic.

Although there may be some installation of equipment associated with this project, there is no potential for increased hazards to traffic due to the design of potential new equipment. There will be no impacts to emergency response access or to parking capacities. Any construction would be at existing facilities, so there is no possibility of an impact to alternative transportation programs, plans, or policies.

16. Utilities and Service Systems

The project will not cause any existing facilities to expand the number of organic liquid storage tanks, nor will any new facilities be built because of these proposed amendments. Implementation of the proposed control requirements will not result in the production of any wastewater or solid waste. There is, therefore, no potential to violate wastewater treatment standards at any existing wastewater treatment facility. There will be no necessity for new wastewater treatment facilities. Because the project will not cause the installation of new tanks, there will be no need for any new stormwater drainage. The project will not require the use of any water. Because the project will not cause any increase in wastewater or solid waste, there is no possibility of an impact to any existing wastewater treatment facility or to any landfill. Federal, state, and local solid waste regulations are not affected by this proposal.

17. Mandatory Findings of Significance

The project does not 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.

The reduction of emissions of organic vapors is part of a long-term plan to bring the Bay Area into compliance with the federal and state ambient air quality standards for ozone. The project does not have adverse environmental impacts that are limited individually, but cumulatively considerable when considered in conjunction with other regulatory control projects.

The project does not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.