

Appendix D

Notice of Preparation and Initial Study Supporting Information

Appendix D – Notice of Preparation and Initial Study Supporting Information

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NOTICE OF PREPARATION

TO: State Clearinghouse
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95812

FROM: John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

SUBJECT: Notice of Preparation of a Draft Subsequent Environmental Impact Report

PROJECT NAME: Paramount Petroleum AltAir Renewable Fuels Project

PROJECT LOCATION: 14700 Downey Avenue, Paramount, CA 90723

PROJECT CASE #: CUP 757 Amendment

PROJECT APPLICANT: AltAir Paramount

The City of Paramount will be the Lead Agency and will prepare a Subsequent Environmental Impact Report (SEIR) for the Project identified above and all interested agencies, organizations and individuals are invited by the City to comment on the scope and content of the SEIR. This document is a Subsequent EIR to the previously prepared Mitigated Negative Declaration for the Alt-Air Renewable Fuels Project adopted December 30, 2013 and amendments. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed Project.

The Project description, location and the potential environmental effects are contained in the attached materials.

A Scoping Meeting has not been scheduled for this Project at this time due to the COVID-19 pandemic. For the convenience of property owners and residents in the Project area, comments can be provided via email as detailed below. The Scoping comments should be limited to understanding the proposed Project and associated environmental concerns, including potential mitigation measures and possible alternatives to the Project. The attached Project overview and scope of analysis identified by staff will be used as a starting point for discussion during the scoping meeting, but other environmental concerns may be raised by the public at this meeting.

For current Project information, the following page has been established on the City's website: <http://www.paramountcity.com/government/planning-department/planning-division/environmental-documents>

Due to the time limits mandated by State law, your response must be received at the earliest possible date, but not later than 30 days after receipt of this notice.

Please send your response to John Carver, Planning Department Director, at the address shown above or email to the email address below.

Date: June 4, 2020

Planner: John Carver, JCarver@paramountcity.com

Department: Planning

Telephone: (562) 220-2048

cc: Clerk of the Board (please post for 30 days)

Encl: Project Overview and Scope of Analysis

PROJECT OVERVIEW AND SCOPE OF ANALYSIS

A. Applicant

Kathryn Gleeson, Director Environmental Services
AltAir Paramount
14700 Downey Avenue
Paramount, California 90723

B. Project Location, Current Use, and Surrounding Use

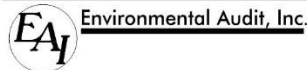
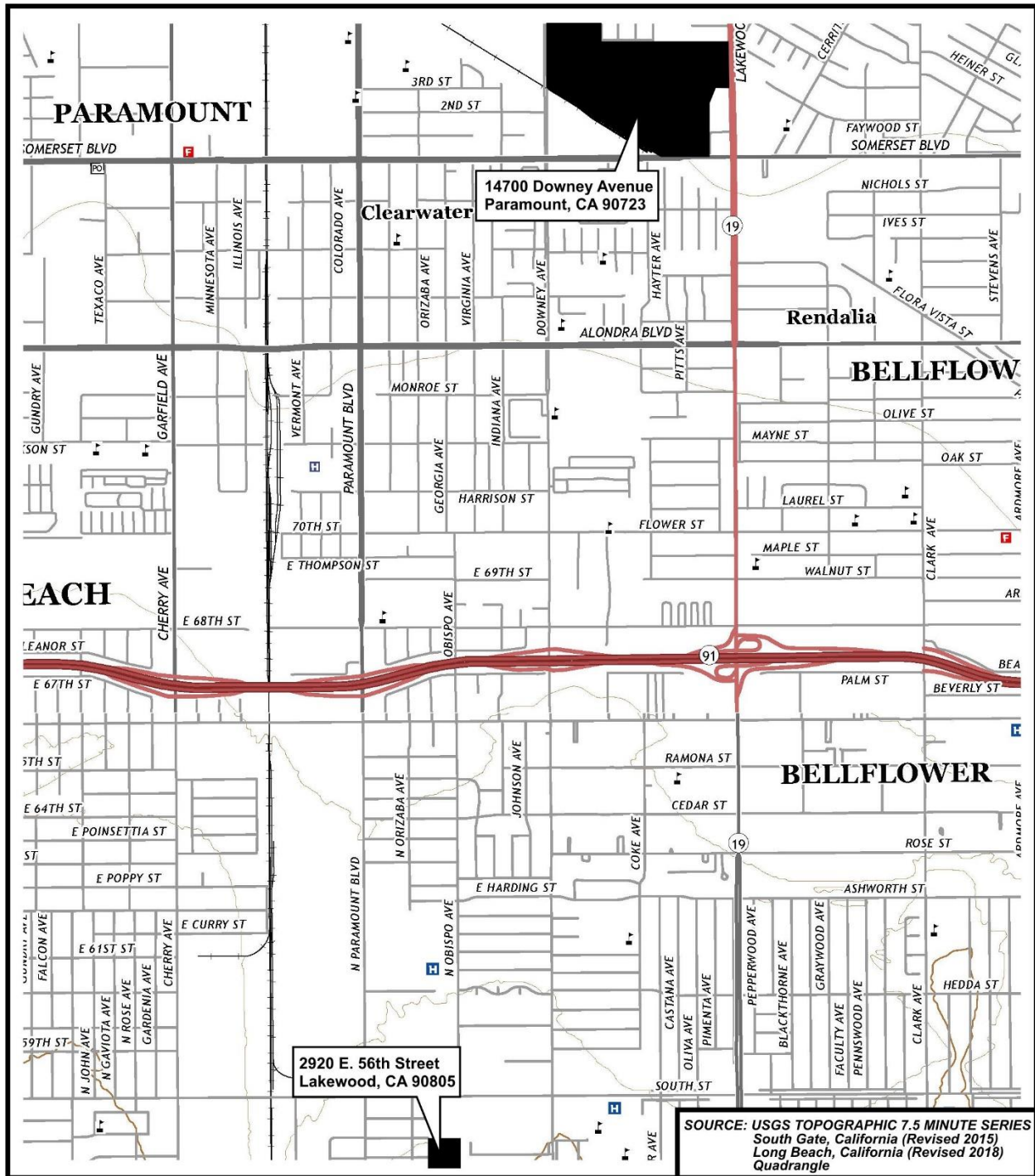
The Refinery is located at 14700 Downey Avenue, Paramount, California (see Figure 1). The City is located east of the Los Angeles River and is approximately 16.5 miles southeast of downtown Los Angeles. The City of Paramount is bounded by the cities of South Gate, Downey, Bellflower, Long Beach, Compton, and Lynwood. The Refinery is bounded by Lakewood Boulevard, Somerset Boulevard, Downey Avenue, and Contreras Street.

The Paramount Facility resides on a 66-acre complex and includes Refinery processing units, renewable fuel processing units, over 1.7 million barrels of product storage; truck loading and unloading facilities; and railcar loading and unloading facilities. The current renewable fuels operation has been in continuous production since January of 2016.

The Refinery is located immediately west of the City of Bellflower municipal boundary lines, and approximately one-quarter mile south of the City of Downey boundary line. Regional access to the Refinery is provided by Interstates 605 and 710 which run north-south approximately two-and-one quarter miles east and west of the Refinery, respectively. State Route 91 runs east-west and is located approximately two miles south of the Refinery. Interstate 105 runs east-west and is located about three-quarters of a mile north of the Refinery (see Figure 1).

The Refinery accounts for slightly more than half of the total acreage within the Somerset Ranch Area of the 1990 Paramount General Plan. The Somerset Ranch Area of Paramount is designated as “Mixed Use” and includes a mix of residential, commercial, industrial, and public uses. The Refinery is zoned M-2, Heavy Manufacturing. The land use pattern varies widely in the Paramount area on a parcel by parcel basis and reflects an area in transition from a variety of older land uses (that include the Refinery) to newer development (including apartment houses and commercial land uses, e.g., grocery stores and a Walmart).

The Project also includes utilizing two existing 55,000-barrel storage tanks at the Lakewood Tank Farm. The Lakewood Tank Farm is located at 2922 E. South Street, Lakewood, California (see Figure 1). The Tank Farm is zoned by the City of Lakewood as M-1 (light manufacturing). The Tank Farm is located on South Street, west of Downey Avenue. Regional access to the Tank Farm is also provided by Interstates 605 and 710. Land uses surrounding the Tank Farm include commercial and residential land uses, as well as Davenport Park.



**SITE LOCATION MAP
PARAMOUNT PETROLEUM ALTAIR
RENEWABLE FUELS PROJECT**

C. Request/Description

Overview of the Project:

In 2018, World Energy purchased AltAir and the Paramount Refinery, and AltAir became a wholly owned subsidiary of World Energy. Under World Energy, AltAir proposes to complete the conversion of the Paramount Refinery to manufacturing only renewable fuels.

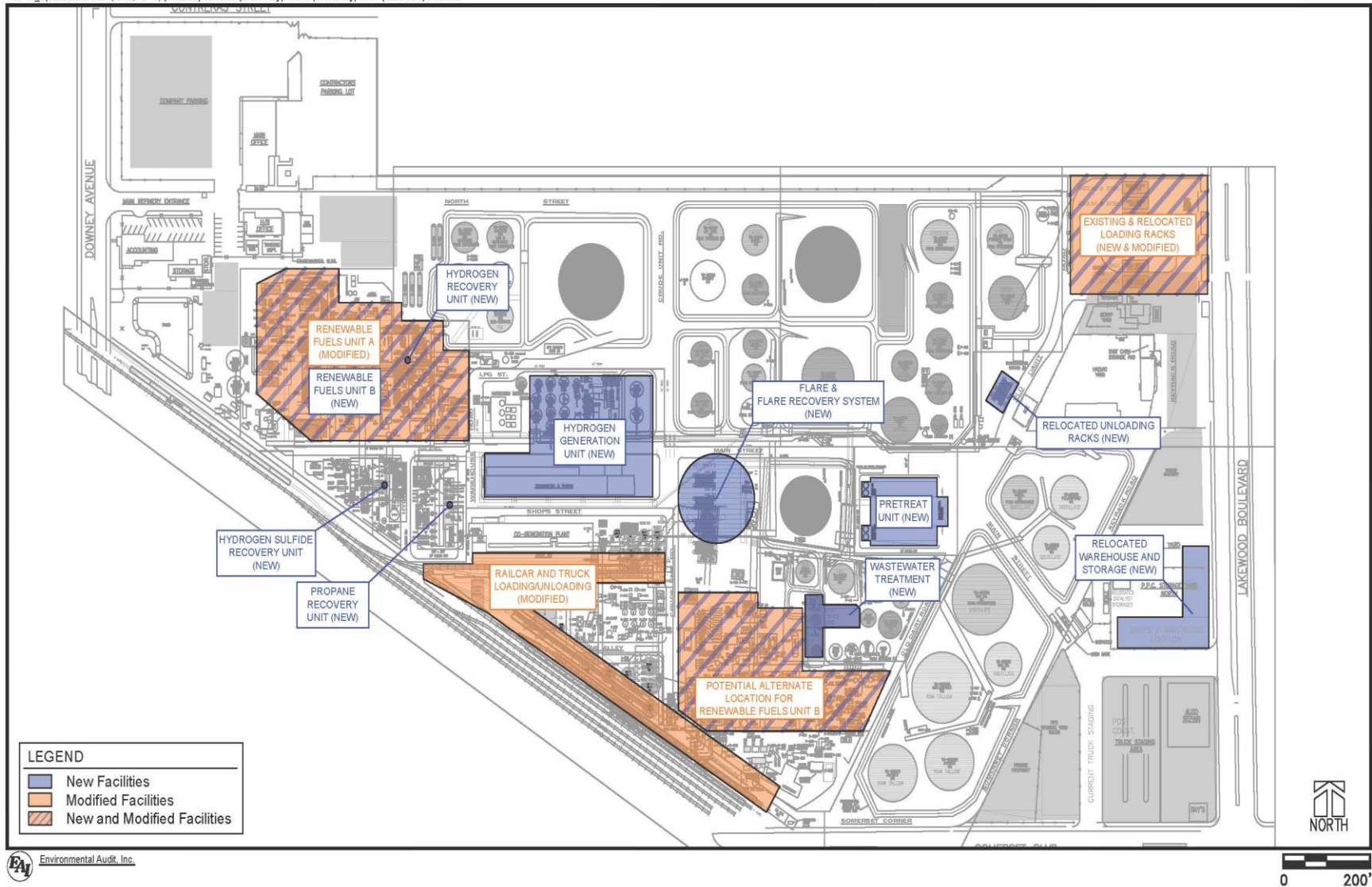
The modifications to the Renewable Fuels Project will convert the remainder of the Paramount crude oil Refinery into a renewable fuels production facility, eliminating the refining of crude oil. The Project modifications will include a new Pretreat Unit, modifications to the existing Renewables Fuels Units, a new Renewable Fuels Unit, a new Hydrogen Generation Unit, a new Hydrogen Recovery Unit, a new Propane Recovery Unit, upgrades to the existing wastewater treatment system, a new Hydrogen Sulfide Recovery Unit, a second Sour Water Stripper, a new flare, modifications to the truck and rail loading/unloading racks, and new pipelines within the facility. In addition, some existing tanks will be upgraded/repared and be permitted to handle different products (e.g., non-edible vegetable oils and beef tallow). The Project also includes utilizing two existing 55,000-barrel storage tanks at the Lakewood Tank Farm. Table 1 summarizes the changes made to the Refinery as part of the Renewable Fuels Project, as well as those proposed under the currently revised Renewable Fuels Project.

TABLE 1. Comparison of Renewable Fuels Project and Revised Renewable Fuels Project

RENEWABLE FUELS PROJECT	REVISED RENEWABLE FUELS PROJECT
Raw Material	
Only technical grade feed material is processed on site.	Additional and various grades of raw feedstocks will be available for Renewable Fuels Units A and B. Products will be received from domestic and international suppliers, with approximately 25% of the supply being barged to LA Harbor, transferred to tankage and from there trucked to the Paramount facility.
Modify rail unloading rack and one truck unloading rack to unload tallow and vegetable oil.	Existing asphalt loading and unloading rail facilities will be converted to receive raw materials. New rail track internal to the facility will be installed.
Process Units	
No pretreatment is required for technical grade feed material	A pretreatment unit will be added so that a greater variety and grade of feed materials can be processed
Renewable Fuels Unit A	Expand Renewable Fuels Unit A. Install New Renewable Fuels Unit B.
Support Units	
Liquid hydrogen supplied via truck and converted to gas and then compressed by a hydrogen compressor	Install New Hydrogen Generation Unit and New Hydrogen Recovery Unit.

RENEWABLE FUELS PROJECT	REVISED RENEWABLE FUELS PROJECT
	Initially upon completion of Unit A upgrade, use existing pipeline to bring in additional hydrogen. Following the construction of the Hydrogen Generation Unit, the pipeline may be used to transfer out excess hydrogen from the Hydrogen Generation Unit to other users or to receive back-up hydrogen supply.
The Naphtha Stabilizer separates Naphtha from light products. The remaining propanes and butanes are mainly for use as facility fuel gas	Add propane recovery equipment to the Naphtha Stabilizer unit to recover propane and butane from process gases for use in product blending or for fuel.
Amine Scrubber was modified to use an amine solution that removed carbon dioxide in addition to hydrogen sulfide for fuel gas treatment. Sour gas from the amine treating unit was routed to H-907 incinerator and caustic scrubber for sulfur removal. Sulfide agent purchased for processing needs.	New Hydrogen Sulfide Recovery Unit to remove hydrogen sulfide from acid gas and return it to the renewable fuel process units, which reduces purchases and truck trips of sulfiding agent, as well as the volume of acid gas requiring treatment at the incinerator.
Sour water (water containing hydrogen sulfide and ammonia) is managed in Sour Water Stripper	The Sour Water Stripper Unit will be modified for the additional sour water that will be generated by the increased operation.
Use existing flare system for Renewable Fuels Unit A	Install second flare which will be balanced with the existing flare to serve existing and new hydrogen and processing units.
Use Existing Wastewater Treatment System	Upgrade Wastewater Treatment System to handle increased process generated wastewater
Utilities	
Use existing boiler feed water system	New water treatment unit for boiler feed water used at the Hydrogen Generation Unit will be installed.
Use existing boilers for steam.	Use steam produced in Hydrogen Generation Unit supplemented by Cogen Plant steam. Use existing boilers as back up.
Use existing cooling towers	Refurbish and return two additional existing cooling towers to service
Use existing plant air compressors (C-055 and C-001)	Upgrade existing compressors and purchase up to two new compressors.
Products and Logistics	
Storage Tank Modifications – change the material stored in existing tanks	Change the material stored in additional existing storage tanks.
Use existing truck loading racks	Additional existing truck loading racks will be converted from asphalt to renewable fuels and relocated to support new operation.
Use on-site tankage	Use existing off-site Lakewood Tank Farm for storage and blending of jet fuel in addition to on-site tankage.

The locations of the new and modified facilities are shown in Figure 2.



PRELIMINARY PLOT PLAN
Paramount Petroleum Alt Air Renewable Fuels Project

Background:

AltAir has been in partnership with Paramount Petroleum since 2013, when the Paramount Refinery began the process of converting portions of their oil Refinery into renewable fuels production, under the Paramount Petroleum AltAir Renewable Fuels Project (Renewable Fuels Project). This Project resulted in the repurposing and modification of existing Refinery equipment, primarily the No. 5 Hydrodesulfurization Unit (No. 5 HDS), and the Isomerization Unit as well as some auxiliary treating, vessels, reactors, and stripping units to produce renewable diesel, jet fuel, and naphtha, as well as fuel gas for the heaters and boilers in the processing units from beef tallow and non-edible vegetable oils. The initial CEQA and permitting efforts were approved by the City of Paramount under Conditional Use Permit (CUP) 757, and new and modified air permits were issued by the South Coast Air Quality Management District (SCAQMD). CUP and SCAQMD permit modifications were made as the Project continued to evolve, with the most recent modification approval occurring in November 2015. Construction of the initial modifications to the Paramount Refinery to produce renewable fuels occurred between 2014 and 2015, and the facility began producing Renewable Fuels in 2016.

AltAir's renewable products provide a source of energy in support of California and Federal Low Carbon Fuel Standards. The goals of the standards are to reduce carbon intensity of transportation fuels, complement other state measures for reducing greenhouse gases, transform and diversify the transportation fuel pool, reduce petroleum dependency, and reduce overall air emissions. AltAir's fuels meet all regulatory and commercial specifications without requiring engine modification, while securing a lower emission alternate renewable energy source. AltAir currently supplies renewable gasoline, diesel and jet fuel to fleet services such as UPS, United Airlines, Boeing, the Department of Defense and several California municipalities and school systems, reducing both truck and airline emissions.

AltAir is now proposing to revise the Renewable Fuels Project to include a more comprehensive conversion of the Refinery. The Renewable Fuels Project will convert the remainder of the 39,500 barrel per day crude oil Refinery into a 25,000 barrels per day renewable fuels production facility. This conversion will: eliminate the refining of crude oil; support use of renewable jet fuel, diesel, gasoline and propane; reduce mobile fuel emissions; and will add approximately 30 workers to the current 100 existing jobs.

Construction:

Construction will be phased, with the modifications to Unit A to be completed immediately following receipt of SCAQMD permits to construct. Unit A will be onstream while demolition activities are being completed to allow space for new construction. Demolition activities include relocation of loading and unloading racks and buildings, and removal of asphalt facilities to make room for new equipment installation, including the pretreatment unit, Hydrogen Generation Unit, and new equipment required for Unit B and the support units and utilities (see Table 1). Construction activities will overlap some of the demolition activities and then continue through completion. Therefore, full construction and commissioning activities will take place over a 2 – 3-year timeframe. The demolition activities are expected to occur over a 10-month period and will

overlap an estimated 19 months of Unit B construction activities. AltAir will modify existing equipment, demolish unused equipment that is located where new equipment will be placed, idle-in-place unused equipment, and install new equipment as detailed above.

D. Required Approvals

The proposed Project would require approval from the following public agencies:

- South Coast Air Quality Management District;
- Los Angeles County Sanitation District;
- Los Angeles County Fire Department;
- Regional Water Quality Control Board; and
- Los Angeles Department of Public Works.

E. Project Background

The purpose of the SEIR is to assess the incremental differences between the original Project and the proposed modification in order to evaluate whether the modifications to the original proposal would result in any significant environmental impacts. The SEIR will also identify possible ways to minimize those significant impacts, as well as describe and analyze possible alternatives to the proposed Project if potential significant impacts are identified. Preparation of an NOP and SEIR does not indicate a decision by the City to approve or disapprove the Project. However, prior to making any such decision, the City Council must review and consider the information contained in the SEIR.

F. Issue Areas

The environmental analysis for the proposed Project will focus on Aesthetics, Air Quality, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology & Water Quality, Land Use & Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities & Service Systems. In addition, other issue areas will be discussed along with statutorily required sections and discussion of Project alternatives and cumulative impacts. Some refinement to the issues may be required based on comments received during the NOP scoping process. The following section describes each of the technical Chapters of the EIR in further detail. Each specified impact area warrants an objective and systematic discussion that identifies the baseline environmental setting; thresholds of significance; impacts and their severity; and, where the impact is potentially significant, the mitigation measures to avoid, reduce or eliminate the impact.

Aesthetics

The Aesthetics chapter of the SEIR will include an assessment of the Project area's existing visual resources, the character of public views into, and out of the Project site, and the night-time setting and character of the Project site. The analysis will include potential impacts from the proposed Project on scenic vistas and resources and potential adverse effects from new sources of light. The proposed modifications would include an estimated 13 new vessels, towers, and reactors ranging in size from 35 feet to 100 feet, as well as a proposed flare and heater stack that could exceed 100

feet. This will require a variance from the current height limit in Heavy Industrial Zones of 55 feet. The new vessels, towers, reactors, and flare are expected to be visible to the surrounding community and may make a significant visual change to the facility. The proposed modification to the Lakewood Tank Farm will not require construction of new equipment; no impacts to aesthetics are expected to result from the Lakewood Tank Farm.

There are not expected to be any impacts to scenic resources as all the proposed modifications would continue to be located within the existing property boundaries. No substantial increase in lighting is expected to result from the Project. Construction activities will take place during daylight hours, and the modified Project would continue to operate within the confines of the existing facility which currently contains permanent lighting for nighttime operations. The previous mitigation measure that requires light shielding for any new lighting equipment will continue to apply to the proposed modifications.

Air Quality

The Air Quality chapter of the SEIR will summarize the regional air quality setting, including climate and topography, existing ambient air quality, regulatory setting, and presence of any sensitive receptors near the Project site. The analysis will include potential impacts from criteria air pollutants, toxic-air contaminants, odor-causing compounds, and consistency of the Project with the regional air quality management plan. Toxic emissions and impacts will be assessed using California Air Resources Board (CARB) models and methods and submitted to the South Coast Air Quality Management District (SCAQMD) as appropriate.

The proposed Project modifications are expected to be consistent with the Paramount General Plan, and therefore are expected to be consistent with the 2016 Air Quality Management Plan. Although crude oil will no longer be processed at the site, the Project modifications will result in an increase in emissions from combustion units, additional fugitive emissions (pumps, valves, and compressors), storage tanks, and mobile sources (trucks and employee vehicles). These are new emissions that were not evaluated in the December 2013 Final MND and will require additional impact analyses. Analysis of cumulative impacts will consider future activities at the affected facilities and other projects in the area. Mitigation measures will be developed in accordance with the current SCAQMD Rules and Regulations, Clean Air Plan, and CEQA Handbook. Mitigation measures will be incorporated, where possible, to reduce any potentially significant impacts to a level of insignificance.

Greenhouse Gas Emissions

The Greenhouse Gas Emissions chapter of the SEIR will assess the potential impacts from emissions against the local agency Significance Thresholds (SCAQMD). The proposed Project modifications will increase the amount of renewable fuels produced and further assist with implementing the Low Carbon Fuel Standard (LCFS) by reducing the carbon intensity of transportation fuels. However, the proposed modifications will result in an increase in GHG emissions from combustion units (boilers and heaters), the new Hydrogen Generation Unit, and mobile sources (trucks and employee vehicles). Additional GHG emissions will be generated by construction equipment and mobile sources associated with construction activities. These are new

sources of emissions that were not evaluated in the December 2013 Final MND; as a result, there may be potentially significant impacts associated with the proposed modifications. The Refinery is subject to GHG emission reductions pursuant to AB32, the state-wide GHG reduction plan. The GHG emissions expected to result from the proposed Project will be evaluated in the SEIR, along with their potential impacts on applicable GHG plans, policies, and regulations. Mitigation measures will be proposed, where possible, to reduce any potentially significant impacts to a level of insignificance.

Hazardous Materials/Risk of Upset

The main objectives of the Hazardous Materials/Risk of Upset analysis are to disclose the following to the public and decision-makers: the potential for serious accidents, exposure to the public, the safety and environmental risks of spill events, and the mitigation measures that could reduce these risks. This analysis will consider the potential for hazards, including pool/torch fires, explosion overpressure, thermal radiation, and releases of toxic materials.

The proposed Project modifications will eliminate the processing of crude oil at the site. Animal fats and vegetable oils will replace crude oil as the feedstocks; these feedstocks do not contain the toxic pollutants that crude oil does and are not as flammable as crude oil. While reductions in hazards are expected (e.g., modifying storage tanks to store renewable feedstock), several new units and process vessels may contain flammable explosive vapors, and potential ignition sources will be present at the renewable fuels production facility. These hazards could result in new, off-site impacts that could be potentially significant. The potential hazards associated with new and modified units as well as hazardous emissions impacts on schools and other sensitive receptors in the Project area will be evaluated for both the renewable fuels production facility and Lakewood Tank Farm as part of the analysis completed for the SEIR. Mitigation measures will be proposed, where possible, to reduce any potentially significant impacts to a level of insignificance.

Hydrology & Water Quality

The Hydrology and Water Quality chapter of the SEIR will summarize the setting of the Project site and identify potential effects on drainage, flooding, groundwater, and water quality. This chapter will evaluate the Project's consistency with water quality control plans, waste discharge requirements, and groundwater management plans. The proposed Project modifications are not expected to result in significant impacts to groundwater recharge, drainage patterns, flooding, impacts to stormwater drainage systems, flood hazards to structures, inundation from dam or levee failure, or impacts from seiche, tsunami, or mudflows.

The proposed Project is expected to be a water-demand Project as defined in CEQA Guidelines Section 15155. The proposed modifications include the construction of several new units that will require additional water including the Pretreat Unit and the new Hydrogen Generation Unit. The Project modifications will increase the water use and potentially use additional groundwater volumes, both of which could have potentially significant impacts. The proposed modifications will also result in an increase in wastewater discharge, up to approximately 642,000 gallons (446 gpm). Existing wastewater treatment equipment will be modified to treat an increase in wastewater

generated by the Project modifications. Mitigation measures will be proposed, where possible, to reduce any potentially significant impacts to a level of insignificance.

Land Use and Planning

The Land Use and Planning chapter of the SEIR will evaluate the consistency of the proposed Project with governing land use plans and policies, as well as the Project's compatibility with surrounding land uses, both existing and proposed. All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery and an existing Tank Farm. The existing Refinery is included in the Somerset Ranch Area Plan and zoned as M-2 Heavy Manufacturing under the City of Paramount zoning Codes. The Project is consistent with the land use and zoning, and no zone change, or general plan amendment will be required to accommodate the Project modifications. A Conditional Use Permit (CUP) and a Zone Variance associated with the heights of some of the new structures will be required. The Lakewood Tank Farm is zoned by the City of Lakewood as M-1 (light manufacturing). The Project modifications would continue the use of the existing storage tanks which are compatible with the M-1 zoning. The Project would not conflict with general plan designation, zoning, or conservation plans.

Noise

The Noise chapter of the SEIR will include an evaluation of the existing noise environment and prediction of Project-generated noise from both construction and operation of the proposed Project. Heavy construction equipment and construction-related traffic will generate potentially significant impacts. Several new noise-generating sources will be added to the Refinery. The analysis will include the potential increase in noise associated with the new sources, including the potential for groundborne vibrations. Once constructed, the proposed Project is expected to produce noise in excess of current operations. However, there will be no increase in noise at the Tank Farm following completion of construction activities. Potential noise associated with traffic effects will be evaluated in relation to the Noise Element of the City's General Plan and relevant ordinances. Mitigation measures will be proposed, where possible, to reduce any potentially significant impacts to a level of insignificance.

Transportation

The Transportation chapter of the SEIR will evaluate impacts of the proposed Project on existing and future transportation systems. A Traffic Impact Study will be used to examine the surrounding intersections in the area and the potential impacts the proposed Project may have on the roadways (i.e., level of service analysis). This section will evaluate the adequacy of site access, emergency access, possible design hazards, and on-site circulation. This chapter will include additional analysis of Vehicle Miles Traveled induced by the proposed Project, as well as potential impacts to rail transportation.

The proposed Project modifications will increase rail and truck traffic above the levels evaluated in the December 2013 Final MND. The modifications will increase the delivery of feedstocks by an additional 21,500 barrels per day via ship, railcar, and/or truck. The modifications could require a maximum of approximately 44 railcars per day. Products (gasoline, diesel fuel, jet fuel) are

expected to be transported from the renewable fuels facility via pipeline or truck resulting in an increase of between 300 to 480 trucks per day. Potential mitigation may include the development of a traffic control plan to mitigate potential impacts.

Tribal Cultural Resources

The Tribal Cultural Resources chapter of the SEIR will discuss the potential impacts to historical, cultural, or archaeological resources of significance to California Native American tribes. No existing structures at the Refinery or Tank Farm are eligible for listing in the California Register of Historical Resources or included in a local register of historic resources. The Project modifications would remove Refinery structures and units; however, the buildings, structures, and equipment do not meet the eligibility criteria and would not yield historically important information. No structures would be demolished at the Lakewood Tank Farm. The potential for archaeological resources at the existing Refinery is low due to the character of subsurface soils (recent alluvium) and the fact that the entire site has been previously graded and developed. Based on previous construction activities at the existing Refinery, the proposed modifications are not expected to result in significant adverse impacts to archaeological or tribal resources.

The proposed Project is undergoing AB 52 tribal consultation with the Gabrieleno Band of Mission Indians – Kizh Nation. A series of mitigation measures may be requested as part of that consultation effort. Mitigation measures will be included, where possible, to reduce any potentially significant impacts to a less than significant level.

Utilities & Service Systems

The Utilities & Service Systems chapter of the SEIR will focus on the potential effects on water supply, wastewater treatment, and solid waste disposal. All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. The proposed Project modifications include the construction of several new units, such as the PreTreat Unit and the new Hydrogen Generation Unit. The modifications will increase the facility's water use; while water is currently provided to the existing Refinery, the increase in water use may be substantial and exceed one million gallons per day. The proposed modifications will also increase the wastewater discharged, require additional wastewater treatment facilities, and require modifications to the wastewater discharge permit. Project modifications are not expected to result in an increase in storm water or require new or expanded storm water drainage facilities; rainwater and surface runoff are controlled in the facility process areas, collected, and treated. The proposed Project modifications are expected to increase the amount of solid and hazardous waste generated by the renewable fuels production facility; however, the facility will be required to adhere to federal, state, and local regulations with regard to waste handling, treatment, and disposal. Mitigation measures will be proposed, where possible, to reduce any potentially significant impacts to a level of insignificance.

Project Alternatives

Alternatives will be designed to avoid and/or substantially reduce any impacts that cannot otherwise be mitigated to a level below significance. At this time, Aesthetics, Air Quality,

Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology & Water Quality, Land Use & Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities & Service Systems are considered the primary issue areas that may need to be addressed. This analysis will consider the No Project Alternative, and other alternatives found to be appropriate through the CEQA process. The alternatives discussion will include an analysis of environmental impacts of each alternative considered, along with a comparative analysis (matrix) to distinguish the relative effects of each alternative and its relationship to Project objectives. The alternatives analysis will also identify the “environmentally superior alternative” from among the alternatives.

**Paramount Petroleum
AltAir Renewable Fuels Project**

Initial Study

Submitted to:

City of Paramount
Planning Division
16400 Colorado Avenue
Paramount, California 90723

Prepared by:

MRS Environmental
1306 Santa Barbara St
Santa Barbara, CA 93101

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1.0 INTRODUCTION

1.1 Project Overview

In 2018, World Energy purchased AltAir and the Paramount Refinery, and AltAir became a wholly owned subsidiary of World Energy. Under World Energy, AltAir proposes to complete the conversion of the Paramount Refinery to manufacturing only renewable fuels, which was started with earlier permits and environmental review that began in 2013.

The modifications to the Renewable Fuels Project (Project) would convert the remainder of the Paramount crude oil Refinery into a renewable fuels production facility, eliminating the refining of crude oil. The Project modifications would include a new Pretreat Unit, modifications to the existing Renewables Fuels Units, a new Renewable Fuels Unit, a new Hydrogen Generation Unit, a new Hydrogen Recovery Unit, a new Propane Recovery Unit, upgrades to the existing wastewater treatment system, a new Hydrogen Sulfide Recovery Unit, a second Sour Water Stripper, a new flare, modifications to the truck and rail loading/unloading racks, and new pipelines within the facility. In addition, some existing tanks would be upgraded/repared and be permitted to handle different products (e.g., non-edible vegetable oils and beef tallow). The Project would also include utilizing two existing 55,000-barrel storage tanks at the Lakewood Tank Farm.

The Project is subject to analysis pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the City is the lead agency with principal responsibility for considering the Project for approval (14 CCR 15000 et seq.).

1.2 California Environmental Quality Act Compliance

CEQA, a statewide environmental law contained in California Public Resources Code (PRC) Sections 21000–21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment (PRC Section 21000 et seq.). The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the project. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an environmental impact report (EIR) and balance the project’s environmental concerns with other goals and benefits in a statement of overriding considerations. The initial CEQA and permitting efforts were approved by the City of Paramount under Conditional Use Permit (CUP) 757, and new and modified air permits were issued by the South Coast Air Quality Management District (SCAQMD). CUP and SCAQMD permit modifications were made as the Project continued to evolve, with the most recent modification approval occurring in November 2015. Construction of the initial modifications to the Paramount Refinery to produce renewable fuels occurred between 2014 and 2015, and the facility began producing Renewable Fuels in 2016. The CEQA review for the previous Project included

a Mitigated Negative Declaration for Paramount Petroleum Alt Air Project adopted December 30, 2013, and revised per Addendum May 14, 2014. (There was also an addendum to Mitigated Negative Declaration and Initial Study adopted November 10, 2014.

This initial study (IS) has been prepared by the City as the lead agency, in accordance with the CEQA Guidelines, to evaluate potential environmental effects and to determine whether an environmental impact report (EIR), a negative declaration, or a mitigated negative declaration (MND) should be prepared for the proposed Project. The IS provides a discussion for each issue area and it includes detailed information on the previously analyzed environmental impacts under the previous MNDs.

1.3 Preparation and Processing of this Initial Study

The City’s Planning Department directed and supervised preparation of this Initial Study (IS). Although prepared with assistance from the consulting firm MRS Environmental, Inc., the content contained, and the conclusions drawn within this IS reflect the independent judgment of the City.

1.4 Initial Study Checklist

MRS Environmental, Inc., under the City’s guidance, prepared the Project’s Environmental Checklist (i.e., Initial Study) per CEQA Guidelines Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is found in Section 3, Initial Study, of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination made in the checklist for the Project.

For this Initial Study, one of the following four responses is possible for each environmental issue area:

1. Potentially Significant Impact
2. Less-Than-Significant Impact with Mitigation Incorporated
3. Less-Than-Significant Impact
4. No Impact

The checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the Project. In doing so, the City will determine the extent of additional environmental review, if any, for the Project.

1.5 Point of Contact

The City of Paramount is the lead agency for this environmental document. Any questions about preparation of this IS, its assumptions, or its conclusions should be referred to the following:

Name: John Carver, Director of Planning
City of Paramount
Planning Department

**Paramount Petroleum AltAir Renewable Fuels Project
Initial Study**

16400 Colorado Avenue
Paramount, California 90723
Phone: (562) 220-2048

The point of contact for the applicant is as follows:

Kathryn Gleeson, Director, Environmental Services
AltAir Paramount
14700 Downey Avenue
Paramount, CA 90723

2.0 PROJECT DESCRIPTION

2.1 Project Location

The existing Paramount Refinery is located at 14700 Downey Avenue, Paramount, California (see Figure 1). The City is located east of the Los Angeles River and is approximately 16.5 miles southeast of downtown Los Angeles. The City of Paramount is bounded by the cities of South Gate, Downey, Bellflower, Long Beach, Compton, and Lynwood. The Refinery is bounded by Lakewood Boulevard, Somerset Boulevard, Downey Avenue, and Contreras Street.

The Refinery is located immediately west of the City of Bellflower municipal boundary lines, and approximately one-quarter mile south of the City of Downey boundary line. Regional access to the Refinery is provided by Interstates 605 and 710 which run north-south approximately two-and-one quarter miles east and west of the Refinery, respectively. State Route 91 runs east-west and is located approximately two miles south of the Refinery. Interstate 105 runs east-west and is located about three-quarters of a mile north of the Refinery (see Figure 1).

The Lakewood Tank Farm is located at 2922 E. South Street, Lakewood, California, west of Downey Avenue (see Figure 1). Regional access to the Tank Farm is also provided by Interstates 605 and 710.

2.2 Environmental Setting

Existing Project Site

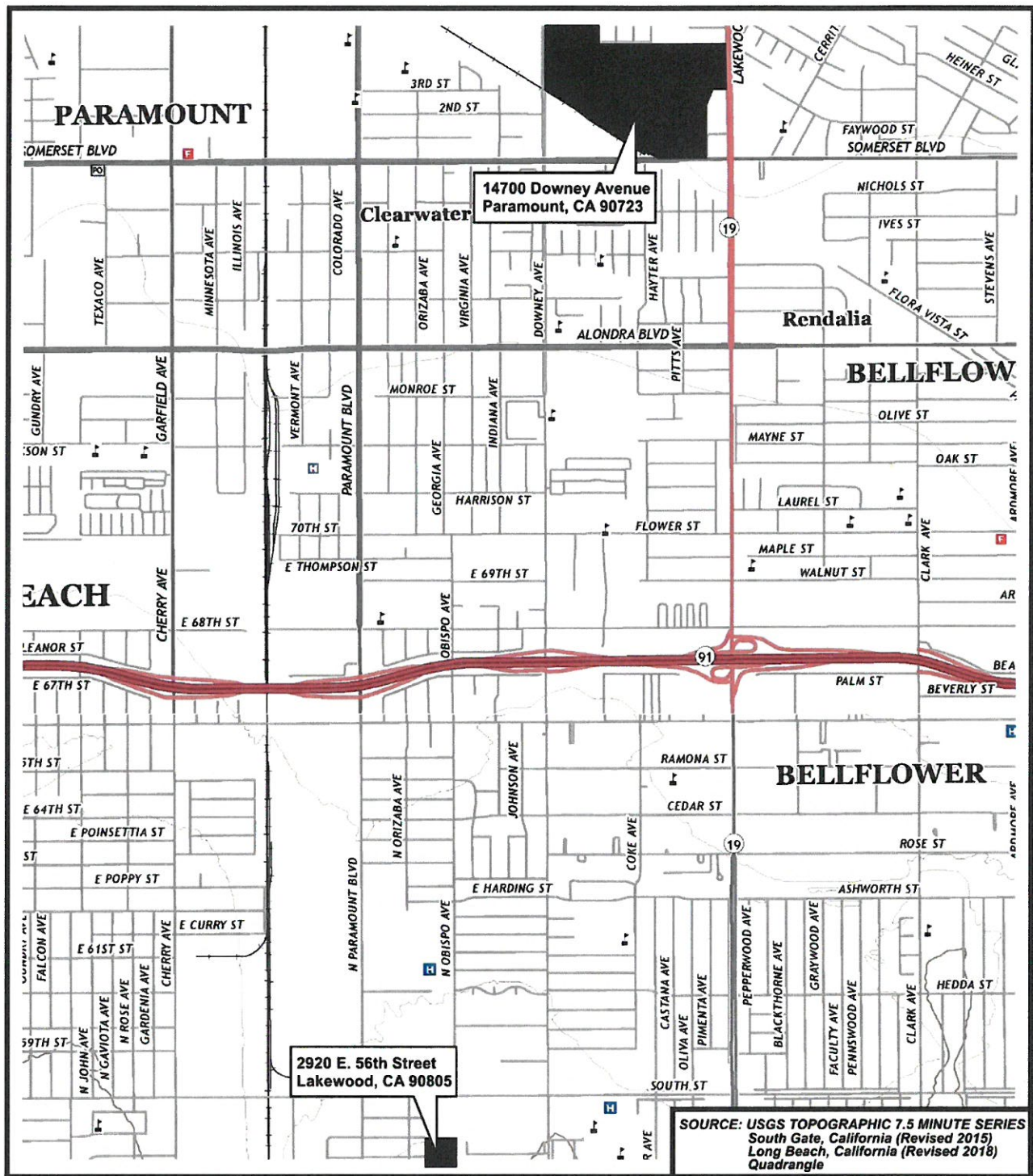
The Paramount Facility resides on a 66-acre complex at 14700 Downey Avenue and includes refinery processing units, renewable fuel processing units, over 1.7 million barrels of product storage; truck loading and unloading facilities; and railcar loading and unloading facilities. The current renewable fuels operation has been in continuous production since January of 2016.

The Refinery accounts for slightly more than half of the total acreage within the Somerset Ranch Area of the 1990 Paramount General Plan. The Somerset Ranch Area of Paramount is designated as “Mixed Use” and includes a mix of residential, commercial, industrial, and public uses. The Refinery is zoned M-2, Heavy Manufacturing. The Tank Farm is zoned by the City of Lakewood as M-1 (light manufacturing).

Surrounding Land Uses

Land uses surrounding the proposed Project site include schools, residential areas, mobile home park, apartments, commercial buildings and transportation corridors. The land use pattern varies widely in the Paramount area on a parcel by parcel basis and reflects an area in transition from a variety of older land uses (that include the Refinery) to newer development (including apartment houses and commercial land uses, e.g., grocery stores and a Walmart). Land uses surrounding the Lakewood Tank Farm include commercial and residential land uses, as well as Davenport Park.

Paramount Petroleum AltAir Renewable Fuels Project
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SOURCE: USGS TOPOGRAPHIC 7.5 MINUTE SERIES
South Gate, California (Revised 2015)
Long Beach, California (Revised 2018)
Quadrangle



SITE LOCATION MAP
PARAMOUNT PETROLEUM ALTAIR
RENEWABLE FUELS PROJECT

2.3 Proposed Project

AltAir has been in partnership with Paramount Petroleum since 2013, when the Paramount Refinery began the process of converting portions of their oil refinery into renewable fuels production, under the Paramount Petroleum AltAir Renewable Fuels Project (Renewable Fuels Project). This Project resulted in the repurposing and modification of existing refinery equipment, primarily the No. 5 Hydrodesulfurization Unit (No. 5 HDS), and the Isomerization Unit as well as some auxiliary treating, vessels, reactors, and stripping units to produce renewable diesel, jet fuel, and naphtha, as well as fuel gas for the heaters and boilers in the processing units from beef tallow and non-edible vegetable oils. The initial CEQA and permitting efforts were approved by the City of Paramount under Conditional Use Permit (CUP) 757, and new and modified air permits were issued by the South Coast Air Quality Management District (SCAQMD). CUP and SCAQMD permit modifications were made as the Project continued to evolve, with the most recent modification approval occurring in November 2015. Construction of the initial modifications to the Paramount Refinery to produce renewable fuels occurred between 2014 and 2015, and the facility began producing Renewable Fuels in 2016.

In 2018, World Energy purchased AltAir and the Paramount Refinery, and AltAir became a wholly owned subsidiary of World Energy. Under World Energy, AltAir proposes to complete the conversion of the Paramount Refinery to manufacturing only renewable fuels.

AltAir's renewable products support California and Federal Low Carbon Fuel Standards. The goals of the standards are to reduce carbon intensity of transportation fuels, complement other state measures for reducing greenhouse gases, transform and diversify the transportation fuel pool, reduce petroleum dependency, and reduce overall air emissions. AltAir currently supplies renewable gasoline, diesel and jet fuel to fleet services such as UPS, United Airlines, Boeing, the Department of Defense and several California municipalities and school systems, reducing both truck and airline emissions.

AltAir is now proposing to revise the Renewable Fuels Project to include a more comprehensive conversion of the Refinery. The Renewable Fuels Project would convert the remainder of the 39,500 barrel per day crude oil Refinery into a 25,000 barrels per day renewable fuels production facility. This conversion would: eliminate the refining of crude oil; support use of renewable jet fuel, diesel, gasoline and propane; reduce mobile fuel emissions; and would add approximately 30 workers to the current 100 advanced, green economy jobs.

The revised Renewable Fuels Project is being proposed to complete the Paramount Refinery's conversion to renewable fuels. Existing Refinery equipment would be used to the extent possible and new equipment would be brought in as needed. Some existing Refinery equipment would be eliminated in areas where new equipment would be installed. Several upgrades are being included that would improve efficiencies and reduce emissions throughout the operation.

Project Objectives

The Renewable Fuels Project would complete the conversion of the Paramount Refinery to manufacturing only renewable fuels. The objectives for the proposed Project include the following:

Paramount Petroleum AltAir Renewable Fuels Project Initial Study

Objectives

- Reduce dependency on fossil fuels (both foreign and domestic);
- Provide fuels that meet the requirements of CARB's Low Carbon Fuel Standard (Title 17, CCR Sections 95480-95490), which reduces the carbon intensity of transportation fuels in California; and
- Reduce individual truck and airplane emissions by providing lower emission fuels.

Local Objectives

- Convert the Paramount Refinery to a 100 percent renewable fuels production facility;
- Eliminate the refining of crude oil at the Paramount Refinery, while protecting high quality jobs;
- Minimize or eliminate the transport of hydrogen via truck;
- Reuse existing refinery equipment, to the extent feasible, to minimize construction activities;
- Phase construction activities to increase the production of renewable fuels as soon as possible (i.e., modifications to Unit A will be completed immediately after receipt of all permits);
- Increase the types of raw materials that can be used to manufacture renewable fuels from technical grade tallows and vegetable oils, to also include lower grade fats, greases and oils;
- Increase use of renewable fuel gases to operate the facility's heaters and boilers; and
- Recycle hydrogen sulfide onsite to minimize the purchase and truck transport of new sulfide material to the site.

Previously Approved Renewable Fuels Project

The Renewable Fuels Project allowed the facility to convert up to 3,500 barrels per day of non-edible vegetable oils and beef tallow into renewable fuels, including aviation (jet), diesel, naphtha (gasoline), and fuel gas. The Project involved the modification of certain existing refinery equipment, including the addition of new vessels and reactors. The previously approved project resulted in the following modifications:

Raw Materials

- Raw Material Supplies. Technical Grade animal fats and vegetable oils were used as feed material for the process.
- Raw Material Unloading Facilities. The existing rail unloading rack was modified to add an off-loading manifold, pump, and piping to unload up to 25 railcars per delivery of tallow and vegetable oil. One existing truck unloading rack was also modified to receive the same feed materials.

Process Units

- First Stage Processing – Renewable Fuels Feed Pretreatment and Deoxygenation (Renewable Fuels Unit A). The first stage process was developed using two reactors to remove particulates and trace contaminants from the feed and then remove the oxygen. The feed is heated and then separated, with gases going to the amine scrubbing system to be cleaned for fuel usage; and liquid products (i.e., green

paraffinic diesel) going to a stripper tower and then to the Second Stage Processing unit; and residual water going to the existing wastewater treatment system.

- Second Stage Processing – Renewable Fuels Isomerization Process (Renewable Fuels Unit A). The second stage process was designed to hydrocrack, isomerize, and fractionate the green paraffinic diesel from the First Stage Processing and produce renewable jet fuel and diesel, as well as naphtha and liquified propanes, butanes and pentanes. Most of the second stage process, including vessels, heaters, exchangers, pumps, piping, and fugitive components, were repurposed refinery equipment from the No. 5 HDS Unit and the Isomerization Unit. The fractionation of the second stage reactor effluent into finished products takes place in a fractionation tower that was repurposed from the naphtha hydrotreater. Vessels, pumps, and heat exchangers associated with the fractionation tower were repurposed from other units in the complex.
- Naphtha Stabilization Unit. The lightest products produced in the Renewable Fuel Units are naphtha and gases. The naphtha stabilizer separates the lighter gas components from the renewable naphtha so that stabilized (less volatile) renewable naphtha can be blended into a renewable gasoline. The lighter gases go into the fuel gas system.

Support Units

- Hydrogen. Additional hydrogen was required for the Renewable Fuels Program in both the first and second stage reactors. The new hydrogen system included three 18,000-gallon capacity storage tanks. Liquid hydrogen was delivered to the facility via truck, stored, and then converted to gas as needed to provide hydrogen to the Renewable Fuels Project.
- Acid Gas Disposal. Acid gas is gas that contains hydrogen sulfide (H₂S). Acid gas is generated in the process reactors and is carried by the gaseous overhead product from the unit into the fuel gas treatment system. The fuel gas treatment system consists of an Amine Scrubber that removes hydrogen sulfide from the gas so that the treated gas can be used for fuel. For the Renewable Fuels Project, the amine solution used in the amine treating unit was replaced with an amine solution that separates out hydrogen sulfide and carbon dioxide (CO₂). Treated gases go into the fuel gas system. The acid gas, laden with the hydrogen sulfide and carbon dioxide go to an incinerator, where the hydrogen sulfide is converted to sulfur dioxide (SO₂). The sulfur dioxide is then scrubbed out with a caustic solution.
- A second stand-alone caustic scrubber and incinerator system is available as a back-up for the incinerator and scrubber system. This back-up caustic scrubber scrubs the acid gas first and then sends it to its associated incinerator.

Utilities

- Existing equipment for process fuel, heating, cooling and instrument air are used for the process.

Products and Logistics

- Finished Products: The process units produce renewable fuel gas, naphtha, jet fuel and diesel. Renewable diesel can be used directly as motor vehicle fuel or blended with conventional or other biofuels. Renewable jet fuel is blended with conventional jet fuel to make the finished product to supply airlines. Conventional jet fuel is brought into the facility and stored in existing storage tanks for blending with the

produced Renewable jet fuel. Renewable Naphtha can be blended with ethanol for a fully renewable gasoline or with conventional gasoline components.

- Storage Tanks: The Renewable Fuels Project used existing storage tanks and no new storage tanks were required. However, storage tank permits were modified as needed to allow for the storage of the feed material and renewable products.
- Loading Racks: Existing loading racks and pipeline were used to ship renewable and blended products. No permit modifications were required.

Revised Renewable Fuels Proposed Project

The revised Renewable Fuels Project is being proposed to complete the Paramount Refinery's conversion to renewable fuels. Existing refinery equipment would be used to the extent possible and new equipment would be brought in as needed. Some existing refinery equipment would be eliminated in areas where new equipment would be installed. Several upgrades are being proposed that would improve efficiencies and reduce emissions throughout the operation. The proposed modifications to the Renewable Fuels Project are identified below.

Raw Materials

- Raw Materials: In addition to technical grade tallows and vegetable oils, lower grade fats, greases and oils, such as used cooking oil, would be received to support the production activities.
- Unloading Facilities: Raw materials would continue to be received by rail or by truck. Approximately 25% of the raw material would be shipped by barge to the Port of LA area, where it would be transferred to local tank storage prior to loading into trucks for transport to the Paramount facility.

Process Units

- A new Pretreat Unit would be installed to condition the new lower grade raw feed materials for the new and modified Renewable Fuel Units.
- The existing Renewable Fuels Unit A would be upgraded to increase capacity and more efficiently produce renewable diesel, jet fuel and gasoline.
- A new Renewable Fuels Unit B would be installed to produce additional renewable diesel, jet fuel and gasoline. The unit would also produce gases that would be used to fuel heaters and boilers.
- The Naphtha Stabilizer would be modified to add new propane recovery facilities to recover and separate renewable propane and mixed butanes for product sale or fuel for the facility. Currently, propane and butane are mainly directed into the fuel gas system. The renewable fuel gas generated after propane and butane recovery from the units would be supplemented with natural gas if needed to meet the facility's fuel gas demand.

Support Units

- A new Hydrogen Generation Unit would be installed to reduce or eliminate the need to use trucks to transport hydrogen for production use. An existing pipeline is also available to obtain interim increased hydrogen supply from an off-site source prior to construction of the hydrogen plant. Once the hydrogen

plant is constructed, the pipeline may be used to ship excess hydrogen from the Hydrogen Generation Unit back into the supply market. A new natural gas supply pipeline would be installed to provide the feed and fuel to the Hydrogen Generation Unit.

- A new Hydrogen Recovery Unit would be installed to recover hydrogen from the produced process gases currently directed to the fuel gas system and recycle it back to the production process. Hydrogen is more efficiently used in the process than in the fuel gas due to its low heating value.
- A new Hydrogen Sulfide Recovery Unit would be installed to recover and allow reuse of hydrogen sulfide, which is needed in the production process. The current operation uses the sulfide but generates an off-gas (following initial treatment in the fuel gas treatment system) which is then treated by incineration and scrubbing. Recycling of the hydrogen sulfide would allow for greatly reduced truck trips of new sulfide material as well as reduced off-gas that must be treated. The remaining carbon dioxide, which is considered biogenic because it comes from the renewable feed material, would be sent to an incinerator. Alternate methods of recovery are also being researched.
- A new second flare and flare vapor recovery system would be installed and balanced with the existing flare and flare vapor recovery system to service the existing units, the Hydrogen Generation Unit and the new processing units.
- The Sour Water Stripper Unit would be modified to provide facilities to treat an increased amount of sour water generated by the process and to recover aqueous ammonia, which can be used in heater SCRs to control NOx emissions.
- Additional Wastewater Treatment facilities would be installed for increased wastewater generated by the additional processing equipment.

Utilities

- New water treatment would be installed for the boiler included with the Hydrogen Generation Unit.
- The Hydrogen Generation Unit and the restart of the existing cogeneration plant would provide most of the steam for the operation. Existing boilers would be used as needed.
- Two existing cooling towers would be refurbished and returned to service to supplement the two currently in operation.
- Air compressors would be refurbished or replaced and up to two new compressors will be purchased.

Products and Logistics

- The products produced by the Project would be the same naphtha, jet fuel, diesel and fuel gas with the exception the additional separation of propanes, butanes and pentanes from the fuel gas system to be used as gasoline blend components or fuel gas, whereas in the existing units, the propanes, butanes and pentanes mainly go to the fuel gas system.
- Existing product storage tanks would be re-permitted as needed for the Renewable Fuels operation. No new hydrocarbon product storage tanks would be constructed. Existing storage and pipeline facilities at the company's off-site Lakewood Tank Farm would resume service for jet fuel storage and blending.

- Existing truck loading and unloading facilities (mainly racks previously used for asphalt) would be modified and relocated for the Renewable Fuels operation.
- Existing railcar loading and unloading facilities would be modified for the variety of raw materials and products that are needed for and produced by the Renewable Fuels operation.

Table 1 summarizes the changes made to the Refinery as part of the previously approved Renewable Fuels Project, and well as those proposed under the currently revised Renewable Fuels Project.

TABLE 1. Comparison of Renewable Fuels Project and Revised Renewable Fuels Project

RENEWABLE FUELS PROJECT	REVISED RENEWABLE FUELS PROJECT
Raw Material	
Only technical grade feed material is processed on site.	Additional and various grades of raw feedstocks will be available for Renewable Fuels Units A and B. Products will be received from domestic and international suppliers, with approximately 25% of the supply being barged to LA Harbor, transferred to tankage and from there trucked to the Paramount facility.
Modify rail unloading rack and one truck unloading rack to unload tallow and vegetable oil.	Existing asphalt loading and unloading rail facilities will be converted to receive raw materials. New rail track internal to the facility will be installed.
Process Units	
No pretreatment is required for technical grade feed material	A pretreatment unit will be added so that a greater variety and grade of feed materials can be processed
Renewable Fuels Unit A	Expand Renewable Fuels Unit A. Install New Renewable Fuels Unit B.
Support Units	
Liquid hydrogen supplied via truck and converted to gas and then compressed by a hydrogen compressor	Install New Hydrogen Generation Unit and New Hydrogen Recovery Unit. Initially upon completion of Unit A upgrade, use existing pipeline to bring in additional hydrogen. Following the construction of the Hydrogen Generation Unit, the pipeline may be used to transfer out excess hydrogen from the Hydrogen Generation Unit to other users or to receive back-up hydrogen supply.
The Naphtha Stabilizer separates Naphtha from light products. The remaining propanes and butanes are mainly for use as facility fuel gas	Add propane recovery equipment to the Naphtha Stabilizer unit to recover propane and butane from process gases for use in product blending or for fuel.
Amine Scrubber was modified to use an amine solution that removed carbon dioxide in addition to hydrogen sulfide for fuel gas treatment. Sour gas from the amine treating unit was routed to H-907 incinerator and caustic scrubber for sulfur removal. Sulfide agent purchased for processing needs.	New Hydrogen Sulfide Recovery Unit to remove hydrogen sulfide from acid gas and return it to the renewable fuel process units, which reduces purchases and truck trips of sulfiding agent, as well as the volume of acid gas requiring treatment at the incinerator.

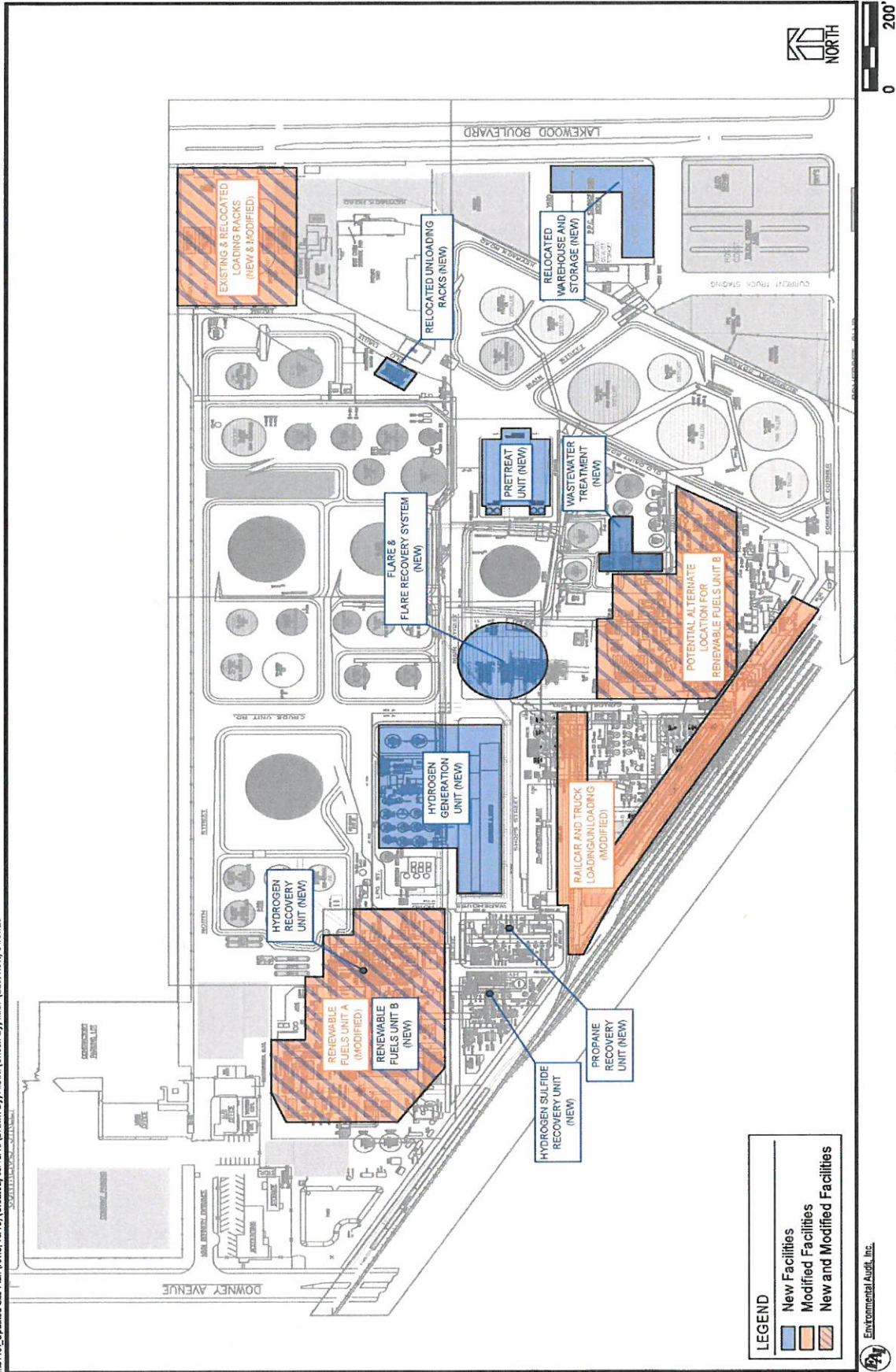
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RENEWABLE FUELS PROJECT	REVISED RENEWABLE FUELS PROJECT
Sour water (water containing hydrogen sulfide and ammonia) is managed in Sour Water Stripper	The Sour Water Stripper Unit will be modified for the additional sour water that will be generated by the increased operation.
Use existing flare system for Renewable Fuels Unit A	Install second flare which will be balanced with the existing flare to serve existing and new hydrogen and processing units.
Use Existing Wastewater Treatment System	Upgrade Wastewater Treatment System to handle increased process generated wastewater
Utilities	
Use existing boiler feed water system	New water treatment unit for boiler feed water used at the Hydrogen Generation Unit will be installed.
Use existing boilers for steam.	Use steam produced in Hydrogen Generation Unit supplemented by Cogen Plant steam. Use existing boilers as back up.
Use existing cooling towers	Refurbish and return two additional existing cooling towers to service
Use existing plant air compressors (C-055 and C-001)	Upgrade existing compressors and purchase up to two new compressors.
Products and Logistics	
Storage Tank Modifications – change the material stored in existing tanks	Change the material stored in additional existing storage tanks.
Use existing truck loading racks	Additional existing truck loading racks will be converted from asphalt to renewable fuels and relocated to support new operation.
Use on-site tankage	Use existing off-site Lakewood Tank Farm for storage and blending of jet fuel in addition to on-site tankage.

The locations of the new and modified facilities are shown on Figure 2.

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1/31/19, Updated Site Plan (rev.3, ver.13) (Created) 08/13/19 (Drawn By) A.S.K. (Check By) M.C. (Last Rev.) 04/01/20



PRELIMINARY PLOT PLAN
Paramount Petroleum Alt Air Renewable Fuels Project

Figure 2

Project No. 3119

2.4 Construction Schedule

Construction would be phased, with the modifications to Unit A to be completed immediately following receipt of SCAQMD permits to construct. Unit A would be onstream while demolition activities are being completed to allow space for new construction. Demolition activities would include relocation of loading and unloading racks and buildings, and removal of asphalt facilities to make room for new equipment installation, including the pretreatment unit, Hydrogen Generation Unit, and new equipment required for Unit B and the support units and utilities. Construction activities would overlap some of the demolition activities and then continue through completion. Therefore, full construction and commissioning activities would take place over a 2 – 3-year timeframe. The demolition activities are expected to occur over a 10-month period and would overlap an estimated 19 months of Unit B construction activities. AltAir would modify existing equipment, demolish unused equipment that is located where new equipment would be placed, idle-in-place unused equipment, and install new equipment as detailed above.

2.5 Project Approvals

The proposed Project would require approval from the following public agencies:

- South Coast Air Quality Management District;
- Los Angeles County Sanitation District;
- Los Angeles County Fire Department;
- Regional Water Quality Control Board; and
- Los Angeles Department of Public Works.

3.0 INITIAL STUDY CHECKLIST

1. Project title:

Paramount Petroleum AltAir Renewable Fuels Project

2. Lead agency name and address:

City of Paramount
Planning Department
16400 Colorado Avenue
Paramount, California 90723

3. Contact person and phone number:

Name: John Carver, Director of Planning
Phone: (562) 220-2048
Email: jcarver@paramountcity.com

4. Project location:

14700 Downey Avenue, Paramount, CA 90723

5. Project sponsor's name and address:

Kathryn Gleeson, Director, Environmental Services
AltAir Paramount
14700 Downey Avenue
Paramount, CA 90723

6. General plan designation: Somerset Ranch Area Plan

7. Zoning: The Project site is zoned M2 – Heavy Manufacturing.

8. Description of project:

The modifications to the Renewable Fuels Project would convert the remainder of the crude oil Refinery into a renewable fuels production facility, eliminating the refining of crude oil. The proposed Project modifications include a new Pretreat Unit, modifications to the existing Renewables Fuels Units, a new Renewable Fuels Unit, a new Hydrogen Generation Unit, a new Hydrogen Recovery Unit, a new Propane Recovery Unit, upgrades to the existing wastewater treatment system, a new Hydrogen Sulfide Recovery Unit, a second Sour Water Stripper, a new flare, modifications to the truck and rail loading/unloading racks, and new pipelines within the facility. In addition, some existing tanks would be upgraded/repaired and be permitted to handle different products (e.g., non-edible vegetable oils and beef tallow). The proposed Project would also include utilizing two existing 55,000-barrel storage tanks at the Lakewood Tank Farm. See Section 2.3, Proposed Project, for additional details.

9. Surrounding Land Uses and Setting:

Land uses surrounding the proposed Project site include schools, residential areas, mobile home park, apartments, commercial buildings and transportation corridors. See Section 2.2, Environmental Setting, for details on the surrounding land uses and setting.

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

See Section 2.5, Project Approvals, for details.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Tribes that requested notice of projects within the City have been noticed per the requirements of AB52. The Gabrieleno Band of Mission Indians requested consultation and formal consultation has commenced to determine the potential for significant impacts to tribal cultural resources.

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.

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology & Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology & Water Quality | <input type="checkbox"/> Land Use & Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population & Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Utilities & Services Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

Determination:

On the basis of this initial evaluation:

- I find that 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 or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that 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, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature



Date

Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analyses Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 Department 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

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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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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IX. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would				
i) result in a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) 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; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XII. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIV. 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XV. PUBLIC SERVICES. Would the project:				
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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XVI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the waste water 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XXI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3.1 Aesthetics

- a) *Would the project have a substantial adverse effect on a scenic vista?*
- c) *Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Previous Environmental Review: The December 2013 Final MND evaluated the addition of ten new process vessels (drums, vessels, towers and reactors). The new vessels had varied heights, and all were shorter than the existing equipment, with the exception of the new fractionation tower which was 168

feet tall. The fractionation tower was the only new equipment that introduced a minor visual change to the Refinery that would be visible from outside the Refinery. The fractionation tower would have a similar appearance as the existing structures and the impacts were determined to be less than significant, with a mitigation measure that required the tower to be painted in lighter colors that will blend into the background.

Proposed Project Modifications: *Potentially Significant Impact.*

The major modifications to the Project would include a new and modified Renewable Fuels Units, a new Hydrogen Generation Unit, an upgraded wastewater treatment system, a new Hydrogen Sulfide Recovery Unit, a second Sour Water Stripper, and a new flare. The Project modifications would include an estimated 13 new vessels, towers, and reactors ranging in size from 35 feet to 100 feet. In addition, a new flare and heater stack are proposed that could exceed 100 feet. The new vessels, towers, reactors and flare are expected to be visible to the surrounding community because of their height and may make a significant visual change to the facility. The Project modifications would require a variance from the current height limit in Heavy Industrial Zones of 55 feet. The currently proposed modifications include a number of tall structures in addition to those evaluated in the December 2013 Final MND. Therefore, the proposed modifications would result in a potentially significant impact.

The Project modifications would not result in the construction of any new equipment at the Lakewood Tank Farm, so no new structures would be visible to the surrounding environment. The modifications would be limited to maintenance of existing equipment. Therefore, no impacts associated with the Lakewood Tank Farm are expected.

b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

Previous Environmental Review: The previous CEQA review concluded that all new equipment would be located within the existing Refinery. The Paramount General Plan does not include any designated scenic corridors and no designated State or County scenic highways are located within the City or near the Refinery. The closest officially designated scenic highway to the Refinery is Route 2, Angeles Crest Scenic Byway, approximately 22 miles north from the Refinery. In addition, there are no historically significant buildings within the Refinery that would be affected by the Project.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing property boundaries and would not damage any scenic resources. There are no historically significant buildings at the facility that would be affected by the modifications. Further, no trees or rock outcroppings are located within the operating portions of the facility, nor are there trees or rock outcroppings that would be impacted by the Project modifications. Therefore, no impacts associated with state scenic highways or scenic resources would occur.

The Project modifications would not result in the construction of any new equipment at the Lakewood Tank Farm, so no new structures would be visible to the surrounding environment. The modifications would be limited to maintenance of existing equipment within the existing Tank Farm which is not located in a scenic area and does not have any historically significant buildings. Therefore, no impacts would occur.

d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Previous Environmental Review: Construction activities were not anticipated to require additional lighting because they were scheduled to take place during daylight hours. Since the Project would be located within the boundaries of an existing Refinery, additional temporary lighting, if needed, was not expected to be discernible for the existing permanent night lighting already associated with the Refinery operations. In addition, the Project components were located within existing industrial facilities, which are already illuminated for nighttime operations. Therefore, no overall increase in lighting associated with the Project was expected. A mitigation measure was developed to ensure that appropriate light shielding was provided for any new lighting equipment as a means to limit glare and light trespass. The lighting plan was required to be submitted to the Chief Building Official for review and approval prior to issuance of any building permits.

Proposed Project Modifications: *Less Than Significant with Mitigation.*

Construction activities associated with the Project modifications are not anticipated to require additional lighting because they would take place during daylight hours. Since the Project would be located within the boundaries of an existing industrial facility, additional temporary lighting, if needed for construction activities, is not expected to be discernible from the existing permanent night lighting already associated with the facility operations.

Once construction activities are complete, the modified Project would continue to operate within the confines of the existing facility which currently contains permanent lighting for nighttime operations. No overall increase in lighting is expected due to the Project. The previous mitigation measure that requires light shielding for any new lighting equipment would continue to apply to the proposed modifications. Therefore, the proposed Project would result in a less than significant impact with mitigation.

The Project modifications would not result in the construction of any new equipment at the Lakewood Tank Farm and no new light sources would be installed. The modifications would be limited to maintenance of existing equipment within the existing Tank Farm; therefore, no new light or glare impacts would be expected at the Lakewood Tank Farm.

3.2 Agriculture and Forestry Resources

- a) *Would the project 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 nonagricultural use?*
- b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*
- c) *Would the project 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) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- e) *Would the project 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?*

Previous Environmental Review: The previous environmental review concluded that no agricultural activities, farmland, or forest lands are located within the Refinery, and no land within the Refinery is subject to a Williamson Act Contract. The Refinery is located in an urban area; the applicable Somerset Ranch Area Plan does not contemplate any agricultural land uses within the Project site or adjacent parcels, and none currently exist. The Somerset Ranch Area Plan designation does not include any forest land and does not include forest land preservation. Furthermore, no loss or conversion of existing forest land or farmland would result from the proposed Project's implementation. Therefore, it was determined that the Project would have no impact to agricultural land, farmland, or forestland.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would occur within the confines of the existing Refinery and Lakewood Tank Farm; no agricultural activities are located within the Refinery or Tank Farm. The Project modifications would not involve the conversion of any agricultural land or farmland to an urban use and would not result in any impacts on farmlands.

The existing Refinery and Tank Farm are located within an urbanized, industrial area and no forest lands are located within or adjacent to the City or either facility. As a result, the Project would not cause the loss or conversion of forest land to non-forest use, nor would the Project cause the rezoning of forest land or timber resources.

As a result, the currently proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to farmland, agricultural land, or forest land. Therefore, no impacts associated with agriculture and forestry resources are anticipated.

3.3 Air Quality

a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

Previous Environmental Review: The December 2013 Final MND concluded that the Project was consistent with the 2012 Air Quality Management Plan, which was the applicable air plan at the time that document was completed. The 2012 AQMP demonstrated that the applicable ambient air quality standards could be achieved within the timeframes required under federal law. Growth projections from the local general plans adopted by cities in the region are provided to the Southern California Association of Governments (SCAG), which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the local general plans and any supporting growth projections are considered to be consistent with the AQMP. Because the Project would not exceed any adopted growth projections, it was considered to be consistent with the 2012 AQMP.

Proposed Project Modifications: *No Impact.*

The most recent air plan for the South Coast Air Basin is the 2016 AQMP. The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved in the South Coast Air Basin within the timeframes required under federal law (SCAQMD, 2016). An inventory of existing emissions in the Basin is included in the baseline inventory in the AQMP. The AQMP identifies emission reductions from existing sources and air pollution control measures that are necessary in order to comply with the state and federal ambient air quality standards (SCAQMD, 2016). The control strategies in the AQMP are based on projections from the local general plans provided by the cities and counties in the district. Projects that are consistent with the local General Plans are consistent with the AQMP. The City of Paramount designates the Project site as heavy manufacturing. The proposed modifications to the Refinery would continue the use of the site for heavy industrial activities and would be consistent with the Paramount General Plan. The proposed renovations to the Lakewood Tank Farm would continue the use of the site for industrial activities and would be consistent with the City of Lakewood General Plan. As a result, the currently proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to compliance with applicable air plans. Therefore, the proposed Project would be consistent with applicable air quality plans, and there would be no impact.

b) *Would the project 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?*

Previous Environmental Review: The cumulative analysis for the Renewables Fuels Project indicated that the long-term air quality impacts from exposure to toxics were expected to be less than significant. Health Risk Assessments prepared for the Project indicated that the emissions from the Project would be less than the carcinogenic and non-carcinogenic significance thresholds and that the Renewable Fuels Project would not introduce any new health risk.

Proposed Project Modifications: *Potentially Significant Impact.*

In addition to the units already constructed or modified, the proposed Project modifications would include new units such as the Pretreat Unit, Renewable Fuel Unit B, Naphtha Stabilizer Unit/Propane Recovery unit, a Hydrogen Generation Unit, a Hydrogen Recovery Unit, a Hydrogen Sulfide Recovery Unit, a new boiler feed water treatment system, and a new flare. The proposed Project would also include modifications to existing units, including the expansion of the existing Renewable Fuel Unit A, adding propane recovery equipment to the Naphtha Stabilizer, modifications to the wastewater treatment system, fuel gas treatment system, sour water stripper, storage tanks, railcar loading and unloading, truck loading and unloading, cooling towers, plant and instrument air systems.

The proposed Project modifications would eliminate the processing of crude oil at the site. However, the Project modifications would result in an increase in emissions from combustion units, additional fugitive emissions (pumps, valves, and compressors), storage tanks, and mobile sources (trucks and employee vehicles). These would be new emissions that were not evaluated in the December 2013 Final MND. Therefore, the proposed Project may result in a cumulatively considerable net increase of a criteria pollutant, and there would be a potentially significant impact.

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Previous Environmental Review: Sensitive receptors in the vicinity of the Refinery include schools and residential areas. Potential impacts of the Renewables Fuels Project on sensitive receptors were evaluated using the SCAQMD's Localized Significance Threshold (LST) Methodology. The analysis determined that the Project emissions would be below the SCAQMD LST limits and therefore, the Project's LST impacts were determined to be less than significant.

Proposed Project Modifications: *Potentially Significant Impact.*

The proposed Project modifications would eliminate the processing of crude oil at the site, potentially reducing the exposure of sensitive receptors to toxic air contaminants. Tallow and vegetable oils would be used as the feedstocks to manufacture fuels instead of crude oil. Tallow and vegetable oils do not contain the toxic pollutants that crude oil does; therefore, the proposed Project modifications are expected to reduce the potential exposure to toxic air contaminants.

Nonetheless, the proposed Project would result in modifications to combustion units (e.g., heaters and boilers), fugitive emissions (pumps, valves, and compressors), storage tanks, and mobile sources (trucks and employee vehicles). These sources may result in an increase in emissions of both criteria and toxic air contaminants. The Project modifications would also result in emissions associated with construction activities. Further, there would be a potential increase in the tank throughput and potential increase in emissions at the Lakewood Tank Farm. Therefore, the potential air pollutant impacts of the Project on sensitive receptors would be potentially significant.

- d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Previous Environmental Review: The December 2013 Final MND determined that the Project was not expected to create significant odor impacts during construction. However, the operation of the Project had the potential to create significant odors from the modified feedstock (tallow) storage tank. The feedstock tank was modified to vent emissions to a carbon filter system. Therefore, potential odors would be mitigated to less than significant through the use of an air emission control system.

Proposed Project Modifications: *Potentially Significant Impact.*

The proposed Project modifications would eliminate the processing of crude oil at the site and increase the processing of tallow and vegetable oil. Some of these materials have the potential to generate odors, e.g., beef tallow and used vegetable oil. The Project modifications would increase the volume of these feedstocks at the facility and potentially increase the potential to generate odors. Therefore, there would be a potentially significant odor impact associated with the proposed Project.

No feedstocks would be handled at the Lakewood Tank Farm, rather, the tanks would handle finished products. Therefore, no increase in odor impacts are expected at the Tank Farm.

3.4 Biological Resources

- a) *Would the project have a substantial adverse effect, 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 Wildlife or U.S. Fish and Wildlife Service?*
- b) *Would the project 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 Wildlife or U.S. Fish and Wildlife Service?*
- c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*
- d) *Would the project 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) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Previous Environmental Review: The December 2013 Final MND conducted a review of the California's Natural Diversity Database (CNDD) and determined that no sensitive habitats or protected plant and animal species are located within the Refinery property or within adjacent parcels. There are no native or natural wetland and/or riparian habitats found within the Refinery site. As a result, no impacts on any candidate, sensitive or special status species would result from the Project, and there would be no impact on natural or riparian habitats or protected wetlands.

No natural open space areas are located within the Refinery or surrounding areas that would potentially serve as an animal migration corridor. No trees were located within the southern portion of the Refinery where the Renewable Fuels Project would be constructed; therefore, the Project would not conflict with any local policies or tree preservation ordinances. In addition, the Project was not located within an area governed by a habitat conservation or community conservation plan. As a result, no adverse impacts on local, regional or State habitat conservation plans would result from the Project's implementation. Therefore, it was determined that the Project would have no impact on biological resources.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would continue to be located within the confines of the existing Refinery and the existing tank farm. Both the Refinery and Lakewood Tank Farm are fully developed, and no native vegetation exists within the confines of either facility that supports wildlife or migratory species. The CNDD shows that no sensitive habitats, such as protected wetlands or riparian habitats, or protected plant or animal species are located within the confines of the existing Refinery or adjacent parcels.

Landscape trees are located in areas surrounding the boundaries of the existing Refinery, mostly along the entrance from Downey Boulevard and the adjacent parking lots, as well as surrounding the Lakewood Tank Farm. These trees could provide a roosting area for migratory birds; however, these trees would not be removed or impacted as part of the proposed modifications. Further, trees within the Project site are not protected by tree preservation policies or ordinances.

There is no adopted habitat conservation plan that applies to the Refinery or Tank Farm property as no native habitat exists within the Refinery or Tank Farm. As a result, there would be no impact on adopted conservation plans, and the currently proposed modifications would not alter the conclusions from the December 2013 Final MND. Therefore, the proposed Project would have no impact on biological resources.

3.5 Cultural Resources

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?*
- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*

Previous Environmental Review: The December 2013 Final MND determined that none of the existing facilities located within the Refinery met the criteria for defining a historic resource; no structures at either site are eligible for listing in the California Register of Historical Resources or included in a local register of historic resources. Furthermore, the proposed Project would not affect any existing off-site resources listed in the National Register of Historical Resources or included in a local register of historic resources.

The 2013 Final MND also determined that no archaeological resources were likely to be discovered during excavation activities due to the previous disturbance at the site and the limited degree of excavation that would be required. As a result, no impacts on historical or archaeological resources were anticipated from the proposed Project.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would continue to be located within the confines of the existing Refinery and Tank Farm. Generally, resources (buildings, structures, equipment) that are less than 50 years old are excluded from listing in the National Register of Historic Places unless they can be shown to be exceptionally important. No existing structures at the Refinery or Tank Farm are considered architecturally, historically, or culturally significant, as defined under CEQA Guidelines §15064.5, i.e., no structures are eligible for listing in the California Register of Historical Resources or included in a local register of historic resources. The Project modifications would remove refinery structures and units; however, the buildings, structures, and equipment do not meet the eligibility criteria (e.g., associated with historically important events or people, embodying distinctive characteristics of a type, period, or method of construction), and would not yield historically important information.

The potential for archaeological resources at the Project sites is low due to the character of subsurface soils (recent alluvium) and the fact that the entire Refinery site has been previously graded and developed. Grading for the proposed Project is expected to be limited to trenching to provide utilities to new units, and grading to develop stable foundations for new units and facilities. No significant adverse impacts to archaeological resources are expected since no known cultural resources are located within the existing Refinery; furthermore, the previous grading and development of the site for industrial uses did not result in any archaeological findings. Therefore, the Project would not result in significant impacts or cause substantial adverse change in the significance of a historical or archaeological resource.

The Project modifications to the Lakewood Tank Farm would be located within the confines of the existing tank farm. The modifications would be limited to improvements and maintenance of the existing storage tanks. No structures would be demolished at the Lakewood Tank Farm, and no grading or trenching activities would be required. Therefore, no significant impacts to historical or archaeological impacts at the Tank Farm are expected.

c) *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

Previous Environmental Review: The December 2013 Final MND determined that no cemeteries were located within the properties that surround the Refinery. As a result, the proposed construction activities would not impact any interred human remains.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would continue to be located within the confines of the existing Refinery. The site and adjacent areas have not been used for formal cemeteries. The potential for uncovering human remains is low because the entire Project site has been previously graded and developed. Grading for the proposed Project is expected to be limited to trenching to provide utilities to new units and grading to develop stable foundations for new units and facilities. No significant adverse impacts to human remains are expected since no known human remains are located within or

near the existing Refinery and because of the previous grading and development of the site for industrial uses. As a result, the currently proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to disturbance of human remains.

The Project modifications to the Lakewood Tank Farm would be located within the confines of the existing Tank Farm. The site and adjacent areas have not been used for formal cemeteries. The potential for uncovering human remains is low because the Tank Farm has been previously graded and developed and no archaeological resources were detected. The Project modifications would be limited to improvements and maintenance of the existing storage tanks and no grading or trenching activities would be required. Therefore, no significant impacts to human remains are expected at either project site.

3.6 Energy

- a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Previous Environmental Review: The December 2013 Final MND determined that Southern California Edison and Sempra Energy provide service upon demand and early coordination with these utility companies would ensure adequate and timely service to the Project. Both utilities currently provide service in the area. Thus, no significant adverse impacts on power and natural gas services would result from implementation of the proposed Project.

Proposed Project Modifications: *Less Than Significant Impact.*

The proposed Project modifications would continue the Project started in 2013 to manufacture renewable fuels in compliance with CARB's Low Carbon Fuel Standard (Title 17, California Code of Regulations, Sections 95480-95490), which aims to reduce greenhouse gas emissions by reducing the carbon intensity of transportation fuels used in California by at least 10 percent by 2020.

The proposed Project modifications would require an estimated additional 18.1 megawatts of electricity. As part of the Project modifications, Alt Air would re-start the existing cogeneration unit, producing the additional electricity on-site required to operate the facility, and would not purchase electricity from a public utility company. An estimated maximum increase of 31 million standard cubic feet per day of natural gas is expected to be required for the proposed modifications, the majority of which would be used in the new Hydrogen Generation Unit. The additional use of natural gas would assist the facility in producing additional quantities of renewable fuels that meet the Low Carbon Fuel Standard. As a result, the proposed Project would not alter the conclusions from the December 2013 Final MND with respect to energy (as evaluated in utility and service system impacts section). Therefore, the proposed Project would not use non-renewable resources in a wasteful or inefficient manner, and the Project would have a less than significant impact.

b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Previous Environmental Review: The December 2013 Final MND evaluated impacts to power and natural gas facilities under Utilities and Service Systems. The analysis concluded that the electricity and natural gas is provided to the Refinery upon demand, and early coordination with these utility companies would ensure adequate and timely service to the Project. Thus, no significant adverse impacts on power and natural gas services would result from the Project.

Proposed Project Modifications: *No Impact.*

AltAir has been in partnership with Paramount Petroleum since 2013, when the Paramount Refinery began the process of converting portions of their oil refinery into renewable fuels products, under the Paramount Petroleum AltAir Renewable Fuels Project (Renewable Fuels Project). The Project modified the Refinery to produce renewable diesel, jet fuel, and naphtha, as well as fuel gas for the heaters and boilers in the processing units from beef tallow and non-edible vegetable oils. Construction of the initial modifications to the Refinery to produce renewable fuels occurred between 2014 and 2015, and the facility began producing Renewable Fuels in 2016.

Since that time, World Energy purchased AltAir and the Paramount Refinery, and AltAir became a wholly owned subsidiary of World Energy. Under World Energy, AltAir proposes to complete the conversion of the Paramount Refinery to manufacturing only renewable fuels.

World Energy's renewable products provide a cleaner source of energy by reducing full life-cycle greenhouse gas emissions by over 60 percent relative to fossil fuels. The current Renewable Fuels process produces up to 50 million gallons per year of renewable fuels, equating to a reduction of approximately 365,000 metric tons (MT) carbon dioxide (CO₂). AltAir also supplies jet fuel to United Airlines, which contributes to a reduction in airlines emissions as well. AltAir's fuels meet all regulatory and commercial specifications without requiring engine modification, while securing a renewable alternative energy source.

The proposed Project modifications would continue the Project started in 2013 to manufacture renewable fuels in compliance with CARB's Low Carbon Fuel Standard (Title 17, California Code of Regulations, Sections 95480-95490), which reduces greenhouse gas emissions by reducing the carbon intensity of transportation fuels used in California by at least 10 percent by 2020.

Therefore, the proposed Project would not conflict with adopted energy conservation plans or standards; the Project is expected to assist in implementing CARB's Low Carbon Fuel Standard. As a result, the currently proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to energy (as evaluated in utility and service system impacts section), and there would be no significant adverse impact.

3.7 Geology and Soils

- a) *Would the project directly or indirectly cause 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?*

Previous Environmental Review: The December 2013 Final MND determined that no active faults are known to exist in the City. Furthermore, no areas of the City are included within an Alquist-Priolo Special Studies Zone. As a result, no surface rupture impacts were anticipated to impact the Project site. The Refinery is located within an area where there is an elevated risk of liquefaction. The degree of ground-shaking is dependent on the location of the earthquake epicenter, the earthquake's intensity and a number of other variables. The degree of impact is not different from that anticipated for the surrounding areas.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would continue the Project started in 2013 to manufacture renewable fuels and convert the existing Refinery to a renewable fuels production facility. As stated in the December 2013 Final MND, no areas of the City are included within an Alquist-Priolo Special Studies Zone. Further, the Lakewood Tank Farm is also not located with an Alquist-Priolo zone. As a result, no surface rupture impacts are anticipated to impact the Project sites.

The Cities of Paramount and Lakewood are located within a seismically active region. The most significant potential geologic hazard at the existing Refinery and Tank Farm is estimated to be seismic shaking and liquefaction from future earthquakes generated by active or potentially active faults in the region, including the Whittier-Elsinore, San Andreas, Newport-Inglewood, Norwalk, and Elysian Park. Experience indicates that there has not been any substantial damage, structural or otherwise as a result of earthquakes.

Based on the historical record, it is highly probable that earthquakes will affect the Los Angeles region in the future. Research shows that damaging earthquakes will occur on or near recognized faults which show evidence of recent geologic activity. There is the potential for damage in the event of an earthquake. The hazards of a release during an earthquake are addressed in Section 3.9 - Hazards and Hazardous Materials.

The design of the new renewable fuels facilities would be required to comply with the California Building Code requirements since the proposed modifications would be located in a seismically active area. The California Building Code is considered to be a standard safeguard against major structural failures and loss of life. The code requires structures that will: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage, but with some non-structural damage; and 3) resist major earthquakes without collapse, but with some structural and non-structural damage. The California Building Code bases seismic design on minimum lateral seismic forces ("ground shaking"). The California Building Code requirements operate on the principle that providing appropriate foundations, among other aspects, helps to protect buildings from failure during earthquakes. The basic formulas used for the California Building Code seismic design require determination of the seismic zone and site coefficient, which represent the foundation conditions at the site.

The new equipment at the facility would require building permits, as applicable, for all new structures associated with the Project modifications from the City of Paramount. The facility must receive approval of all building plans and building permits to assure compliance with the latest Building Code adopted by the City of Paramount prior to commencing construction activities. The issuance of building permits from the local authority would assure compliance with the California Building Code requirements which include requirements for building within seismic hazard zones. No new equipment is expected at the Lakewood Tank Farm; therefore, no new geologic hazards would be associated with the site. No significant adverse impacts from seismic hazards are expected since new equipment would be required to comply with the California Building Code.

The proposed modifications would not alter the exposure of people or property to geological hazards such as earthquakes, landslides, mudslides, ground failure, or other natural hazards beyond the current setting. Therefore, no impacts associated with substantial exposure of people or structures to the risk of loss, injury, or death involving the rupture of an earthquake fault, seismic ground shaking, liquefaction or landslides are expected to result from the proposed Project.

b) *Would the project result in substantial soil erosion or the loss of topsoil?*

Previous Environmental Review: The December 2013 Final MND determined that limited excavation would be required. Given the developed character of the Project area and limited area of disturbance, no significant adverse impacts related to substantial soil erosion or loss of topsoil are anticipated.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would continue the Project started in 2013 to manufacture renewable fuels. Grading for the proposed Project is expected to be limited to trenching to provide utilities to new units and grading to develop stable foundations for new units and facilities. No grading or soil disturbance is expected at the Lakewood Tank Farm. Stormwater in the operating portions of the existing Refinery and tank farm are contained onsite and would not result in erosion. Due to the

limited grading and excavation (limited to trenching and foundation preparation), the proposed Project modifications are not expected to result in substantial soil erosion or loss of topsoil. Therefore, the proposed Project would not alter the conclusions from the December 2013 Final MND with respect to erosion and loss of topsoil, and there would be no impact.

- c) ***Would the project 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?***

Previous Environmental Review: The December 2013 Final MND determined that the topography underlying the Refinery is essentially flat and, as a result, no slope failure or landslide would be associated with the Project. As indicated previously, the Project site is located within an area that may be subject to potential liquefaction risk. No significant new grading is anticipated, and the excavation would be limited. As a result, no impacts due to potential unstable soils were anticipated.

Proposed Project Modifications: *Less Than Significant Impact.*

The proposed Project modifications would continue the Project started in 2013 to manufacture renewable fuels. Grading for the proposed Project is expected to be limited to trenching to provide utilities to new units and grading to develop stable foundations for new units and facilities. The issuance of building permits from the local authority would assure compliance with the California Building Code requirements which include requirements for building within seismic hazard zones, including liquefaction risks. No significant adverse impacts from unstable soils are expected since the proposed Project modifications would be required to comply with the California Building Code. No grading or new structures would be required at the Lakewood Tank Farm. As a result, the proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to unstable soils, including liquefaction. Therefore, there would be a less than significant impact.

- d) ***Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

Previous Environmental Review: The December 2013 Final MND determined that the soils that underlie the Project site belong to the Hanford Soil Association and do not represent a constraint to development according to the U.S. Department of Agriculture. The Project site is level and no new grading was anticipated and excavation would be limited. As a result, no expansive soil impacts were anticipated.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would continue the Project started in 2013 to manufacture renewable fuels. Grading for the proposed Project is expected to be limited to trenching to provide utilities to new units and grading to develop stable foundations for new units and facilities. The issuance of building permits from the local authority would assure compliance with the California Building Code requirements, which include requirements for building within seismic hazard zones. No grading or new

structures would be required at the Lakewood Tank Farm. As a result, the currently proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to expansive soils. Therefore, impacts associated with expansive soil are not anticipated.

- e) ***Would the project 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?***

Previous Environmental Review: The December 2013 Final MND determined that no septic tanks would be used as part of the proposed Project's implementation. As a result, no impacts associated with the use of septic tanks would occur as part of the proposed Project.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would continue the Project started in 2013 to manufacture renewable fuels. The existing Refinery discharges wastewater to the local sewer system under an Industrial Wastewater Discharge Permit, and the wastewater generated by the proposed Project would be treated in the existing wastewater treatment system (see Section 3.10 for further details). Neither the existing Refinery nor the proposed modifications would use septic tanks or alternative wastewater disposal systems. The modifications to the Lakewood Tank Farm would not result in any additional wastewater generation. As a result, the currently proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to the use of septic tanks or alternative disposal systems. Therefore, no significant impacts on soils from alternative wastewater disposal systems are expected.

- f) ***Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

Previous Environmental Review: The December 2013 Final MND evaluated the potential paleontological resource impacts under Section V – Cultural Resources (see Section 3.5 (c) above). The December 2013 Final MND determined that the potential for paleontological resources in the areas is low due to the character of subsurface soils (recent alluvium) and the amount of disturbance associated with the previous development within the Refinery. Because of the relatively limited excavation, the nature of the alluvial soils, and the disturbed character of the soils, no significant impacts on paleontological resources were anticipated.

Proposed Project Modifications: *No Impact.*

As evaluated in Section 3.5 (c) above, the proposed Project modifications would continue to be located within the confines of the existing Refinery and Tank Farm. The potential for paleontological resources is low due to the character of subsurface soils (recent alluvium) and the fact that the entire existing Refinery site has been previously graded and developed. Grading for the proposed Project is expected to be limited to trenching to provide utilities to new units and grading to develop stable foundations for new units and facilities. No significant adverse impacts on paleontological resources are expected since

no known paleontological resources are located within the existing Refinery and because of the previous grading and development of the site for industrial uses. No grading, trenching or other ground disturbance would be required at the Lakewood Tank Farm. Therefore, there would be no impact on paleontological or archaeological resources.

3.8 Greenhouse Gas Emissions

a) ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

Previous Environmental Review: The December 2013 Final MND evaluated the potential GHG impacts associated with the Project and determined that total GHG construction emissions associated with the Project were estimated to be 454 metric tons over the entire construction period, or 16 metric tons per year amortized over 30 years.

The operation of the Project included modifications to existing units as well as some auxiliary treating and stripping units, the installation of a new isomerization unit, increased boiler firing, increased electricity use, and additional delivery trips. The total GHG emissions associated with the Project, including the 30-year amortized construction GHG emission, was 17,160 metric tons per year.

The Refinery is subject to GHG emission reductions pursuant to AB32, the state-wide GHG reduction plan. In December 2010, CARB adopted regulations establishing a cap and trade program for the largest sources of GHG emissions in the state that altogether are responsible for about 85 percent of California's GHGs. Among these are fossil-fuel fired power plants, including both plants that generate power within California's borders, and those located outside of California that generate power imported to the state. GHG emissions from this universe of sources were capped for 2013 at a level approximately two percent below the emissions level forecast for 2012, and the cap will steadily decrease at a rate of two to three percent annually from now to 2020. Sources regulated by the cap must reduce their GHG emissions or buy credits from others who have done so. Under AB32, the Refinery must offset any additional GHG emission generated at the Refinery from the proposed Project. Therefore, the only GHG emissions increase from the proposed Project would be from transportation and construction. The total GHG emissions generated from transportation is 1,004 metric tons per year. The total GHG emissions generated from construction is 16 metric tons per year. The total non-AB32 GHG emissions are 1,020 metric tons per year. Thus, the SCAQMD's GHG significance threshold for industrial sources would not be exceeded. Based on the preceding analysis, implementing the proposed Project was not expected to generate significant adverse cumulative GHG air quality impacts.

Proposed Project Modifications: *Potentially Significant Impact.*

The Project modifications would include a more comprehensive conversion of the Refinery to produce 100 percent renewable fuels. In addition to the units already constructed or modified, the Project modifications include new units such as the Pretreat Unit, Renewable Fuel Unit B, Propane Recovery Unit, Hydrogen Generation Unit, Hydrogen Sulfide Recovery Unit, new boiler feed water treatment

system, and a new flare. The Project also includes modifications to existing units, including the existing Renewable Fuel Unit A, the wastewater treatment system, fuel gas treatment system, sour water stripper, storage tanks, railcar unloading, truck loading and unloading, cooling towers, plant and instrument air systems.

The proposed modifications would result in an increase in GHG emissions from combustion units (boilers and heaters), the new Hydrogen Generation Unit, and mobile sources (trucks and employee vehicles). Further, additional construction activities are required that would generate additional GHG emissions from construction equipment and mobile sources, e.g., trucks. These would be new sources of emissions that were not evaluated in the December 2013 Final MND and which require additional analyses. Therefore, there would be a potentially significant impact associated with GHG emissions associated with the proposed Project.

b) *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Previous Environmental Review: The December 2013 Final MND determined that the City of Paramount does not have any plans, policies, standards, or regulations related to climate change and GHG emissions. As a result, the Project would not conflict with any plan, policy or regulation adopted for reducing GHG emissions.

The Project offered GHG emissions benefits that are realized by the use of the renewable fuels produced from the proposed Project. The California Air Resources Board (CARB) established the Low Carbon Fuel Standard (LCFS) to lower GHG emissions associated with gasoline and diesel fuel use. The LCFS would reduce GHG emissions by reducing the carbon intensity of transportation fuels used in California by an average of 10 percent by the year 2020. Depending on the type of feedstock used, the renewable diesel carbon intensity is from 59.9 to 80 percent less than petroleum diesel. Therefore, by providing renewable diesel from a local source, the burden of implementing the LCFS would be lessened and the impacts would be less than significant.

Proposed Project Modifications: *Potentially Significant Impact.*

The proposed modifications would include a more comprehensive conversion of the existing Refinery to produce 100 percent renewable fuels. The Project modifications would increase the amount of renewable fuels produced and further assist with implementing the LCFS by reducing the carbon intensity of transportation fuels.

However, as discussed in Section 3.8 (a) above, the proposed modifications would result in an increase in GHG emissions from combustion units (boilers and heaters), the new Hydrogen Generation Unit, and mobile sources (trucks and employee vehicles). Further, additional construction activities would be required that would generate additional GHG emissions from construction equipment and mobile sources, e.g., trucks. These would be new sources of emissions that were not evaluated in the December

2013 Final MND; these additional emissions would be potentially significant and require additional analyses. Therefore, there would be a potentially significant impact.

3.9 Hazards and Hazardous Materials

a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Previous Environmental Review: The December 2013 Final MND determined that the Refinery uses a number of hazardous materials at the site. The major types of public safety risk were related to the use of petroleum products and consisted of impacts from toxic substance releases, fires, and explosions. In addition, the shipping, handling storing, and disposing of hazardous materials inherently poses a certain risk of release to the environment. The regulated substances handled by the Refinery included dimethyl disulfide, sodium hydroxide, and aqueous ammonia. The Refinery also handled petroleum products including liquid petroleum gas, gasoline, fuels oils, diesel, and other products which pose a risk of fire and explosion.

A hazard analysis was conducted for the Refinery which evaluated 23 existing scenarios. Eight of the scenarios analyzed had potential impacts that remained within the Refinery boundaries and 15 had the potential to impact offsite receptors. The 15 scenarios which had the potential to extend beyond the Refinery boundary included storage vessel upsets, material handling equipment upsets, and process unit equipment upsets (see the December 2013 MND for detailed analysis).

To determine the maximum radius of influence from a potential hazard, endpoint hazard criteria are established for the type of hazard being analyzed. The endpoint hazard criterion established for this analysis correspond to the level at which human injury might occur. Using the CANARY by Quest® hazard model, the maximum radius of influence from a potential hazard was determined for both existing operations and the proposed Project. The modeling analysis included an evaluation of the impact of the release regardless of the cause (e.g., breakdown, human error, terrorism, etc.). Hazard impact results were shown for existing equipment in the vicinity of the proposed Project and the new equipment. For each new potential release, the distance to the threshold level was determined. The proposed Project changed some existing operations (e.g., contents of existing storage vessels) and, as in the case of hydrogen, which was already in use in the Refinery, added storage for hydrogen. However, the proposed Project did not affect the size or the location of the largest potential release at the Refinery. In other words, the proposed Project did not increase the existing magnitude of any release nor shift the location of the existing maximum potential impact from a release at the Refinery. Therefore, the hazard impacts from the proposed Project were expected to be less than significant.

Natural gas, refinery fuel gas, hydrogen, dimethyl disulfide, sodium hydroxide (caustic), and aqueous ammonia were already onsite and in use at the Refinery. The proposed Project would not introduce

new hazardous materials at the Refinery. Therefore, the hazard impacts from the proposed Project were expected to be less than significant.

Proposed Project Modifications: *Potentially Significant Impact.*

The proposed modifications would include a more comprehensive conversion of the existing Refinery to produce 100 percent renewable fuels. The proposed Project modifications would eliminate the processing of crude oil at the site, potentially reducing the hazardous materials used at the renewable fuels production facility. Animal fats and vegetable oils would be used as the feedstocks to manufacture fuels instead of crude oil. Animal fats and vegetable oils do not contain the toxic pollutants that crude oil does and are not as flammable as crude oil.

Nonetheless, the proposed Project would result in the construction of new units and modifications to existing units, including a new Pretreat Unit, modifications to the existing Renewables Fuels Units, a new Renewable Fuels Unit, a new Hydrogen Generation Unit, a new Hydrogen Recovery Unit, a new Propane Recovery Unit, upgrades to the existing wastewater treatment system, a new Hydrogen Sulfide Recovery Unit, a second Sour Water Stripper, modifications to existing truck and rail loading/unloading facilities, a new flare, and new pipelines within the facility. In addition, some existing tanks would be upgraded/repared and be permitted to handle different products (e.g., non-edible vegetable oils and animal fats). Existing storage tanks at the Lakewood Tank Farm would also be put into different service and the vapor control roof seals would be replaced.

While reductions in hazards are expected (e.g., modifying storage tanks to store renewable feedstock), several new units and process vessels may contain flammable explosive vapors and potential ignition sources are present at the facility. These hazards could result in new, off-site impacts that are potentially significant. Therefore, there would be a potentially significant impact as a result of the proposed Project.

- b) ***Would the project 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?***

Previous Environmental Review: The December 2013 Final MND determined that the potential for hazardous and/or risk of upset impacts were discussed in the previous Section 3.9 (a) above, and no further analysis was required in this subsection.

Proposed Project Modifications: *Potentially Significant Impact.*

The Project modifications would include a more comprehensive conversion of the existing Refinery to produce 100 percent renewable fuels. As discussed in Section 3.9 (a) above, while reductions in hazards are expected (e.g., modifying storage tanks to store animal fats or vegetable oil), several new units and process vessels may contain flammable or explosive vapors, and potential ignition sources would be present at the renewable fuels production facility. These hazards could result in new, off-site impacts that are potentially significant. Therefore, there would be a potentially significant impact.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Previous Environmental Review: The December 2013 Final MND determined that the Refinery is located within one-quarter mile of a number of schools. The proposed Project was not expected to impact school sites from handling hazardous materials or wastes because the potential hazards impacts were estimated to be the same or less than the existing hazards present at the Refinery. Hazardous emissions impacts on schools, as well as other sensitive receptors were evaluated as part of the air quality analysis completed for the Initial Study (see Section 3.3 (d) above).

Proposed Project Modifications: *Potentially Significant Impact.*

The proposed Project modifications would include a more comprehensive conversion of the existing Refinery to produce 100 percent renewable fuels. As discussed in Section 3.9 (a) above, while reductions in hazards are expected (e.g., modifying storage tanks to store animal fats or vegetable oil), several new units and process vessels may contain flammable or explosive vapors, and potential ignition sources would be present at the renewable fuels production facility. These hazards could result in new, off-site impacts that are potentially significant to schools in the Project area. Therefore, there would be a potentially significant impact on schools as a result of the proposed Project.

Hazardous emissions impacts on schools and other sensitive receptors would be evaluated for both the renewable fuels production facility and Lakewood Tank Farm as part of the air quality analysis completed for the Project (see Section 3.3 (d) above). No schools are located within one-quarter mile of the Lakewood Tank Farm.

- d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

Previous Environmental Review: The December 2013 Final MND determined that the Project is located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5. The Refinery is included on the list because it was issued a Cleanup and Abatement Order by the State Water Resources Control Board (Order No. 97-130). The Project was not expected to adversely affect the Refinery's Cleanup and abatement Order. The Order will remain in effect and continue to establish requirements for site monitoring and clean up for existing contamination. As a result, no significant adverse impacts would occur with respect to locating the Project on a site included on a hazardous list pursuant to Government Code Section 65962.5.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would include a more comprehensive conversion of the existing Refinery to produce 100 percent renewable fuels. The existing Refinery is located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5. The existing Refinery is included on the list because it was issued a Cleanup and Abatement Order by the

**Paramount Petroleum AltAir Renewable Fuels Project
Initial Study**

State Water Resources Control Board (Order No. 97-130). For sites which are listed pursuant to Government Code Section §65962.5, the following information is required:

Applicant: Paramount Petroleum Corporation
Address: 14700 Downey, Paramount, California 90723
Phone: (562) 531-2060
Address of Site: 14700 Downey, Paramount, California 90723
Local Agency: City of Paramount
Assessor's Book Nos: 7157 007 003 01 000, 7157 007 002 01 000, 6268 005 014 01 000, 6268 005 013 01 000, 6268 005 002 01 000, 6268 005 001 01 000, 6268 005 003 01 000, 6268 003 017 01 000, 6268 003 016 01 000, 6268 003 005 01 000, 6268 003 004 01 000, 6268 003 003 01 000, 6268 003 001 01 000, 6268 003 014 01 000, 6268 002 019 01 000, 6268 002 017 01 000, 6268 002 011 01 000, 6268 002 010 01 000, 6268 002 009 01 000, 6268 002 008 01 000, 6268 002 006 01 000, 6268 002 004 01 000, 6268 002 003 01 000, 8940 389 429 01 000
List: Hazardous Waste and Substances Sites List
Regulatory ID No: 4B192595N02
Date of List: April 1998

The proposed Project is not expected to adversely affect the existing Cleanup and Abatement Order. The Order would remain in effect and continue to establish requirements for site monitoring and cleanup of existing contamination. The Lakewood Tank Farm is not located on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. As a result, the currently proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to hazardous material sites listed pursuant to Government Code §65962.5. Therefore, there would be no impact associated with hazardous materials sites.

- 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 or excessive noise for people residing or working in the project area?***

Previous Environmental Review: The December 2013 Final MND determined that the Project site is not located within two mile or an operational public airport or private airstrip. The nearest airport is located in the City of Compton, approximately five miles to the west of the site. The Los Angeles International Airport (LAX) is located approximately 14 miles to the northwest. The Project would not present a safety hazard related to aircraft or airport operations at a public use airport to people residing or working in the Project area.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery and Tank Farm. The existing Refinery and Tank Farm are not located within two

miles of an operational airport. The nearest airport to both sites is in the City of Compton, approximately five miles to the west of both sites. The Los Angeles International Airport (LAX) is located approximately 14 miles to the northwest of both the existing Refinery and Lakewood Tank Farm. The Project modifications would not present a safety hazard related to aircraft or airport operations at a public use airport to people residing or working in the Project area. Therefore, there would be no impacts associated with airports.

f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Previous Environmental Review: The December 2013 Final MND determined that the Project would not result in any arterials (e.g., roads or streets) being closed to traffic during the Project's construction and subsequent operation. As a result, no significant adverse impacts were anticipated.

Proposed Project Modifications: *No Impact.*

The Project modifications would not impair implementation or physically interfere with any emergency response plan or emergency evacuation plan. The Project modifications would result in modifications to the existing Refinery and Tank Farm. All construction activities would occur within the confines of the existing Refinery and Tank Farm so no emergency response plans at other facilities would be impacted. The existing Refinery has prepared, adopted, and implemented emergency response plans at its facility. The emergency response plans would need to be updated following completion of construction activities. The Project modifications are not expected to alter the route that employees would take to evacuate the site, as the evacuation routes generally direct employees outside of the main operating portions of the facility. The Lakewood Tank Farm also has an emergency response plan. The Project modifications would not result in any new equipment and would not be expected to alter the existing emergency response plan. As a result, the currently proposed modifications would not alter the conclusions from the December 2013 Final MND; therefore, there would be no impact on emergency response or evacuation plans.

g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Previous Environmental Review: The December 2013 Final MND determined that the area surrounding the Refinery is developed and there are no areas containing natural vegetation that could lead to a wildfire. As a result, no Project impacts were associated with potential wildfires from off-site locations.

Proposed Project Modifications: *No Impact.*

The Project modifications would not increase the existing risk of fire hazards in areas with flammable brush, grass, or trees. The Project modifications would not expose people or structures to wildland fires. Further, the existing Refinery and tank farm are not located in an area where residences are intermixed with wildlands. No substantial or native vegetation exists within the operational portions of

the existing Refinery or within the Lakewood Tank Farm. Therefore, the Project modifications would not impact people or structures due to fire hazards from wildland fires. As a result, the currently proposed modifications would not alter the conclusions from the December 2013 Final MND; therefore, no impact on wildland fires would occur.

3.10 Hydrology and Water Quality

- a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Previous Environmental Review: The December 2013 Final MND determined that the Project would not affect the quantity, direction or velocity of on-site storm water runoff due to the paved character of the areas where new equipment would be installed. As a result, no impacts on water quality were anticipated to result from the proposed Project's implementation.

Proposed Project Modifications: *Potentially Significant Impact.*

The proposed modifications to the Renewable Fuels Project include the construction of several new units that would generate additional wastewater, including the PreTreat Unit, wastewater treatment facilities to support the Pretreat Unit, a new Sour Water Stripper, and a new Hydrogen Generation Unit. All of these facilities would generate additional wastewater that would require treatment in the Refineries wastewater treatment plant. The estimated increase in wastewater discharge associated with the Project modifications would be up to approximately 642,000 gallons (446 gpm), which would be well above the wastewater discharge evaluated in the December 2013 Final MND. While the existing Refinery has existing wastewater treatment equipment, the equipment would be modified to treat an increase in wastewater generated by the Project modifications. In addition, the existing industrial wastewater discharge permit would need to be modified with the Los Angeles County Sanitation District Department. Therefore, the Project modifications would increase the wastewater discharged, require additional wastewater treatment facilities, and require modifications to the wastewater discharge permit, which would result in potentially significant impacts.

The only wastewater currently generated at the Lakewood Tank Farm is from groundwater remediation efforts and the sanitary system (i.e., restroom facilities). Groundwater is pumped up and transferred to the Refinery for treatment in the Refinery's wastewater treatment plant. These remediation activities are expected to continue in the future, with or without the proposed Project. No increase in workers is expected at the Lakewood Tank Farm so no increase in sanitary wastewater is expected. No other sources of wastewater are generated at the Lakewood Tank Farm and no increase in wastewater generation would be required as part of the proposed modifications. Therefore, the Lakewood Tank Farm is not expected to violate water quality standards or waste discharge requirements, and no impacts are anticipated.

- b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Previous Environmental Review: The December 2013 Final MND determined the limited excavation required for the proposed Project would not be deep enough to interfere with any local aquifer. Given the nature of the Project, no significant net change in the availability of water would occur.

Proposed Project Modifications: *Potentially Significant Impact.*

The proposed modifications to the Renewable Fuels Project include the construction of several new units that would require additional water, including the Pretreat Unit and the new Hydrogen Generation Unit. The increase in water demand may be substantial and exceed one million gallons per day. Therefore, the Project modifications would increase the water use and potentially use additional groundwater volumes. Therefore, there would be potentially significant impacts associated with the depletion of groundwater resources as a result of the proposed Project.

The proposed modifications are not expected to result in the construction of additional impervious surfaces, since the existing Refinery is largely developed and urbanized. Older refinery structures would be removed to construct new renewable fuels production units. Therefore, the Project modifications would not be expected to interfere with ground water recharge.

Further, water use at the Lakewood Tank Farm is limited to water for the restroom facilities. No increase in workers at the Lakewood Tank Farm is expected, and no increase in water demand would be required as part of the Project modifications. Therefore, the Lakewood Tank Farm would not generate any impacts.

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
- i) *result in a substantial erosion or siltation on- or off-site?*
 - ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?*
 - iii) *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?*

iv) impede or redirect flood flows?

Previous Environmental Review: The December 2013 Final MND determined that no natural drainage or riparian areas remain within the Project site due to past development. As a result, no significant adverse impacts were anticipated.

The December 2013 Final MND determined that there are no natural lakes or streams within or adjacent to the Project site. The proposed Project would not lead to any changes in the hydrologic characteristics of any nearby drainage. No additional impervious surfaces were proposed, and no significant adverse impacts were anticipated.

The December 2013 Final MND determined that no change in the amount of surface runoff volumes within the Project site was anticipated since no additional impervious and/or paved surfaces were proposed. As a result, no significant adverse impacts were anticipated.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery and Lakewood Tank Farm. The proposed Project modifications would not require the construction of additional impervious surfaces; the existing Refinery and Tank Farm are largely developed and urbanized. There are no streams, rivers or other natural drainage within the confines of the existing Refinery or Tank Farm property. Rainwater and surface runoff within the existing Refinery processing areas are controlled, collected, and treated within the Refinery wastewater treatment plant, if needed. Additionally, the proposed modifications are not expected to result in an increase in surface water or impact storm water drainage facilities. Therefore, the proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to flooding associated with the alteration of streams and rivers or water runoff and stormwater drainage systems, and no impacts are expected to result from the proposed Project.

d) Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Previous Environmental Review: The December 2013 Final MND determined that the Project would not impede or redirect the flows of potential floodwater, since the Project area is not located within a flood hazard areas as defined by the Federal Emergency Management Agency's (FEMA's) Flood Insurance Rate Maps and the Project would not involve the placement of any structures that would impede or redirect potential floodwater flows. Therefore, no impacts related to flood flows were anticipated.

The December 2013 Final MND determined that the Refinery is located approximately nine miles inland from the Pacific Ocean and would not be exposed to the effects of a tsunami. In addition, there are no surface water bodies in the immediate area of the Project site that would result in a potential seiche

hazard. As a result, no significant adverse impacts related to seiche, tsunami or mudflows would result from implementation of the Project.

Proposed Project Modifications: *No Impact.*

All the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery and Tank Farm. The Project modifications would not place housing within a 100-year flood hazard area, as defined by FEMA's Flood Insurance Rate Maps, since the proposed modifications would not construct any housing. Further, the existing Refinery and Tank Farm sites are not located within a FEMA flood hazard area and would not impede or redirect potential floodwater flows. Therefore, the proposed modifications would not alter the conclusions from the December 2013 Final MND, and there would be no impacts associated with flooding.

The existing Refinery and Tank Farm are located approximately nine miles inland from the Pacific Ocean and would not be exposed to the effects of a tsunami. In addition, there are no surface water bodies in the immediate area of the Project site that would result in a potential seiche hazard. No significant adverse impacts related to seiche, tsunami or mudflows would result from implementation of the Project. The Project sites are located in an area of flat topography and no hills are located in the area, so mudflows would not be expected to impact either the renewable fuels production facility or Tank Farm sites. As a result, the proposed Project would not alter the conclusions from the December 2013 Final MND with respect to inundation by seiche, tsunami, or mudflows. Therefore, there would be no impact associated with flood hazard zones.

e) ***Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

Previous Environmental Review: The State CEQA Guidelines were amended in July 2015 and the CEQA Checklist has been amended since the December 2013 Final MND was prepared to include this question.

Proposed Project Modifications: *Potentially Significant Impact.*

All the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery and Lakewood Tank Farm. The Project modifications are not expected to result in the construction of additional impervious surfaces, since the existing Refinery and Tank Farm sites are largely developed and urbanized. There is no natural drainage within the existing Refinery or Tank Farm property. Rainwater and surface runoff are controlled, collected, and treated within the operating portions of the existing Refinery and Tank Farm. Therefore, the Project modifications are not expected to impact a water quality control plan. However, as discussed in Section 3.10 (b) above, the proposed modifications would increase water use and would potentially use additional groundwater volumes. Therefore, there would be a potentially significant impact to groundwater management plans.

3.11 Land Use and Planning

- a) *Would the project physically divide an established community?*
- b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Previous Environmental Review: The December 2013 Final MND determined that the City of Paramount is completely urbanized with the remaining undeveloped areas consisting of infill properties. The Renewables Fuel Project is located within the existing Refinery. The Project did not involve the permanent closure of any existing roadways or result in the division of an established residential neighborhood.

The City of Paramount General Plan and Zoning Ordinance define the permitted land uses and the corresponding development standards within the City. The Refinery is included in the Somerset Ranch Area Plan. No zoning change or general plan amendment was required to accommodate the proposed Project use; however, a Conditional Use Permit (CUP) and a Zone Variance were required. The Project site is located inland from the Pacific Ocean and is not located within a designated Coastal Zone. As a result, no significant adverse impacts on land use or established communities were anticipated.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery and an existing Tank Farm. As discussed for the previous Project, the currently proposed modifications would not involve the permanent closure of any existing roadways or result in the division of an established community.

The existing Refinery is included in the Somerset Ranch Area Plan and zoned as M-2 Heavy Manufacturing under the City of Paramount zoning codes. The Project modifications would continue the use of the site as an industrial facility, i.e., renewable fuels production facility, although crude oil would no longer be used. This would be consistent with the land use and zoning, and no zone change, or general plan amendment would be required to accommodate the Project modifications. A Conditional Use Permit (CUP) and a Zone Variance associated with the heights of some of the new structures would be required.

The Lakewood Tank Farm is zoned by the City of Lakewood as M-1 (light manufacturing) which is compatible with the operation of storage tanks. The continued operation of storage tanks at the Lakewood Tank Farm would not disrupt or divide an existing community. Therefore, no impacts associated with physical division of an established community would occur as a result of the proposed Project.

3.12 Mineral Resources

- a) *Would the project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?*
- b) *Would the project 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?*

Previous Environmental Review: The December 2013 Final MND determined that the Refinery site does not contain sand, gravel, mineral, or timber resources, or active oil wells. The Refinery is not located in an area with active mineral extraction activities. A review of the California Division of Oil and Gas field records indicates that no abandoned oil wells are located within the Refinery. The resources and materials used during construction would not include any materials that are considered rare or unique. As a result, no significant adverse impacts on available mineral and energy resources were anticipated.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery and Lakewood Tank Farm. The sites do not contain any known mineral resources including sand, gravel, timber resources, or oil or natural gas reserves. Therefore, there would be no impact on the availability of a locally important mineral source.

3.13 Noise

- a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The CEQA checklist for Noise has been modified; however, noise was evaluated in the December 2013 MND under Subsections 3.12.2 (a, c, and d).

Previous Environmental Review: The December 2013 Final MND determined that the proposed Project was not expected to contribute to any noise since most of the new equipment (vessels and piping) did not generate noise. The Project included new pumps that were not major sources of noise outside the site boundary. Therefore, no discernable change to the existing noise setting during operation of the Project was expected. Noise is also attenuated by the walls and landscaping around the facility.

To mitigate potential noise impacts associated with the operation of the Project, the following mitigation measures were imposed:

- The facility's operation must conform to the City of Paramount Noise Control Ordinance.

- Rail car deliveries and pick-ups would be limited to the non-peak hour traffic periods, after 10:00 am and before 6:00 pm. The Refinery operators and management would continue to work with the railroad so that train traffic to and from the Refinery does not coincide with the morning and evening commute times or when students are going to or leaving school.

The City of Paramount Municipal Code, Sections 45-1 and 45-2, exempts construction noise sources between the hours of 7:00 am and 8:00 pm. Construction activities that would generate noise associated with the proposed Project would be carried out during the daytime hours. Construction activity noise levels at the closest school buildings were expected to be about 44 dBA indoors, and the on-site construction activities were also required to conform to the City's noise control requirements. Therefore, the construction noise levels within school buildings were expected to be below background noise levels and less than significant.

Proposed Project Modifications: *Potentially Significant Impact.*

Construction activities associated with the proposed modifications would generate noise from heavy construction equipment and construction-related traffic. The types of construction equipment that would be used to construct the proposed Project include, but are not limited to, welding machines, trucks, cranes, compressors, loaders, concrete pumps, graders, and pavers. The estimated noise level during installation of various equipment is expected to average about 80 decibels (dBA) at 50 feet from the center of construction activity. Most of the construction noise sources would be located at or near ground level, so the noise levels are expected to attenuate. Nonetheless, the potential generation and exposure to construction noise impacts may be significant.

Once constructed, the proposed Project is expected to produce noise in excess of current operations. The Project modifications would result in the construction of new units and modifications to existing units, including a new Pretreat Unit, modifications to the existing Renewables Fuels Units, a new Renewable Fuels Unit, a new Hydrogen Generation Unit, a new Hydrogen Recovery Unit, a new Propane Recovery Unit, upgrades to the existing wastewater treatment system, a new Hydrogen Sulfide Recovery Unit, a second Sour Water Stripper, modifications to the truck and rail loading/unloading facilities, a new flare, and new pipelines within the existing Refinery. The proposed Project would add new noise sources including compressors, centrifuges, pumps, and fans. The increase in noise sources associated with the proposed Project is potentially significant. Therefore, there would be a potentially significant impact as a result of the proposed modifications.

Noise at the Lakewood Tank Farm would be limited to maintenance activities to replace tank seals and perform other routine maintenance activities. Maintenance activities would be limited to a few workers a day, 1-2 delivery trucks to deliver materials, and welders. Construction activities would be limited to day light hours to avoid the generation of noise during the more sensitive evening and nighttime hours. Once construction activities have been completed, there would be no increase in noise at the Tank Farm as no additional noise generating equipment would be added. Therefore, noise impacts at the Tank Farm would be less than significant following completion of construction activities.

- b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Previous Environmental Review: The December 2013 Final MND determined that the potential groundborne noise was addressed in Section 3.13 (a) above.

Proposed Project Modifications: *Potentially Significant Impact.*

Construction and operation of the proposed Project modifications have the potential to generate groundborne vibration and groundborne noise levels. The perception threshold for ground-born vibration is a velocity of 0.01 inches per second. The Federal Transit Administration's 2006 Noise and Vibration Manual lists the threshold distance in feet for various types of construction equipment. For example, the feet to threshold distance could range from 11 feet to 711 feet for a small bulldozer or a pile driver, respectively. As discussed above in Section 3.13 (a), the proposed modifications would generate noise from heavy construction equipment and construction-related traffic. Therefore, noise associated with the construction and operation of the proposed Project would result in a potentially significant impact.

- c) *For a project located within the vicinity of a private airstrip or 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?*

The CEQA checklist for Noise has been modified; however, noise associated with airports was evaluated in the December 2013 MND under Subsections 3.12.2 (e and f).

Previous Environmental Review: The December 2013 Final MND determined that the Project site is not located within two miles of an operational airport. The Compton-Woodley Airport, a general aviation airport, is located approximately five miles west of the Refinery. As a result, no impacts were expected with regard to excessive noise levels due to airports.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. Neither site is located within two miles of an operational airport. The Compton-Woodley Airport, a general aviation airport, is located approximately five miles west of both the existing Refinery and Lakewood Tank Farm. Therefore, there would be no impact on noise levels due to airports.

3.14 Population and Housing

- a) *Would the project induce substantial unplanned 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) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

Previous Environmental Review: The December 2013 Final MND determined that the Project would not result in any change in the population, housing, or employment projects that would exceed the adopted employment and population projection for the City. No existing housing units would be affected by the proposed Project, and no displacement of residents would occur. In recent years, the Refinery has experienced a reduction in the number of persons employed at the facility. The potential increased employment associated with the Project would be more than off-set by the number of jobs that were eliminated in recent years. As a result, no significant adverse impacts related to population or housing displacement would result from implementation of the Project.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. Construction of the proposed Project would take place over a period of approximately 22 months. At the peak of construction, approximately 240 temporary construction jobs would be created by the proposed Project. Because of the large size of the construction work force available in the southern California area, the 240 temporary construction jobs are expected to be filled from the existing regional labor pool. Because the Project modifications would occur within an existing facility located in a highly urbanized area, no additional housing would be necessary to accommodate the labor force needed during construction; thus, no existing housing would be displaced.

Once construction is completed, approximately 40 additional staff is expected to be needed for long-term operation of the renewable fuels production facility. No increase in workers would be expected at the Lakewood Tank Farm. The Project modifications would not result in any change in the population, housing, or employment projections that would exceed the adopted employment and population projection for the City. In recent years, the existing Refinery has experienced a reduction in the number of persons employed at the facility. The potential increased employment associated with the proposed modifications would be more than off-set by the number of jobs that were eliminated in recent years. Therefore, no significant adverse population or housing impacts are expected to result from the proposed Project.

3.15 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, including: fire protection, police protection, schools, parks, or other public facilities?*

Fire

Previous Environmental Review: The December 2013 Final MND determined that the Project site is served by two fire stations: Station 31, located at 7521 East Somerset Boulevard and Station 57 located at 5720 Gardendale Street in South Gate. Two reportable fire incidents occurred at the Refinery between 2005 and 2009. To minimize the potential for fire incidents, two mitigation measures were imposed:

- The proposed improvements would be subject to review and approval by the Los Angeles County Fire Department to ensure that fire safety and fire prevention measures are incorporated into the Project. In addition, the Fire Department would be required to review and approve any evacuation plan as well as the on-site circulation to ensure that emergency vehicles can easily access the Refinery's parking area.
- The Paramount Petroleum security personnel must ensure that all fire lanes remain open during the Refinery's operation.

The mitigation measures were deemed to reduce the potential impacts on fire services to less than significant.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. The existing Refinery currently maintains personnel and equipment on-site for fire suppression efforts and posts fire emergency procedures. There are fire hydrants along Lakewood and Somerset Boulevards, and Downey Avenue which provide additional fire water flow in the event of an emergency. The renewable fuels production facility would continue to operate needed fire protection services. It is not expected that the Project modifications would require an increase in the level of fire protection service needed to protect and serve the facility, because there would be no new flammable materials stored on-site. The proposed modifications would result in the use of vegetable oils and animal fats tallow and the elimination of the use of crude oil, reducing potential fire risks.

The Lakewood Tank Farm also maintains protection services appropriate for storage tanks, with fire hydrants located adjacent to the site. The closest fire station to the Tank Farm is Los Angeles County Fire Department Station 45 (~1.3 miles), located at 4020 Candlewood Street, Lakewood, CA 90712. The next closest fire station is Long Beach Fire Department Station 12 (~2.3 miles), located at

1199 Artesia Boulevard, Long Beach, CA 90805. The modifications to the Tank Farm would include the maintenance and repair of the existing tanks, which would not be expected to result in an increase in fire hazards or increase the need for fire protection services.

Construction activities are not expected to result in an increased need for fire services. Construction activities include safeguards, monitoring for hazards with equipment designed to detect sources of flammable gases and vapors, written procedures, training, and authorization for equipment used on-site.

Compliance with State and local fire codes is expected to minimize the need for additional fire protection services. The existing Refinery has its own emergency response team, along with the local fire department and other emergency services. On-site fire training exercises with the City Fire Department staff are conducted. The proposed Project would not increase the requirements for additional or altered fire protection. Firefighting and emergency response personnel and equipment would continue to be maintained and operated at the renewable fuels production facility. Therefore, no impacts on fire protection services are anticipated.

Police

Previous Environmental Review: Law enforcement services in Paramount are contracted through the Los Angeles County Sheriff's Department. The City is served by the Lakewood Station at 5130 Clark Avenue in Lakewood and by a substation located near the intersection of Paramount and Somerset Boulevards in Paramount. Emergency response times are approximately three minutes throughout the City. The Project would be located within the Refinery and no public access to this area is permitted. The Refinery also maintains 24-hour security. As a result, no impacts on law enforcement services were anticipated.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. Entry and exit at the existing Refinery are currently monitored and no additional or altered police protection is expected. The Refinery is an existing facility with a 24-hour security force for people and property currently in place. The Lakewood Tank Farm is also fenced, and entry is limited to authorized workers. The closest police station is Lakewood Sheriff Department (~3.1 miles), located at 5130 Clark Avenue, Lakewood, CA 90712. The next closest police station is Long Beach Police - North Division (~2.6 miles), located at 4891 Atlantic Avenue, Long Beach, CA 90807. All Project modifications would occur within the confines of the existing Refinery and Tank Farm which already have security measures in place. Therefore, the proposed Project is not expected to adversely impact the local police department.

Schools

Previous Environmental Review: The Project did not involve any development and/or uses that could potentially affect school enrollments. Since no significant increase in employment is directly

attributable to the Project, no change in school enrollments would occur. As a result, no significant adverse impacts on schools would result from implementation of the Project.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. Construction activities would not involve the relocation of individuals, impact housing or change the distribution of the population. Since construction workers would likely be drawn from the existing employment pool in southern California, it is unlikely that construction worker children would need to change schools and no new schools would need to be built. The increase in the number of permanent workers associated with Project modifications would be limited to approximately 40 staff required during operation of the proposed modifications. In recent years, the existing Refinery has experienced a reduction in the number of persons employed at the facility. The potential increased employment associated with the Project modifications would be more than off-set by the number of jobs that were eliminated in recent years. Therefore, the proposed Project would not alter existing, or require additional schools, and no impact on schools is anticipated.

Other

Previous Environmental Review: The December 2013 Final MND determined that no new government services would be necessary to service the facility. As a result, no significant adverse impacts were anticipated.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. No new government services are expected to be required to serve the proposed Project modifications. Therefore, the proposed Project is not expected to have an impact on parks or other public facilities.

3.16 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?*

Previous Environmental Review: The December 2013 Final MND determined that the City of Paramount operates six public parks devoted to active recreation. No parks or related recreational facilities are located adjacent to the Refinery. In addition, the Project would not result in any development that would potentially increase the demand for public park facilities and services. As a result, no significant adverse impacts were anticipated.

Proposed Project Modifications: *No Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. The proposed Project modifications would not include recreational facilities or increase the demand for neighborhood or regional parks, or other recreational facilities in the area since the proposed Project is not expected to increase the local population. At its peak, construction of the Project modifications would require approximately 240 workers, drawn from the local population so there would be no additional use of local parks or other recreational opportunities. The increase in the number of permanent workers would be limited to approximately 40 required during operation of the Project modifications. In recent years, the Refinery has experienced a reduction in the number of persons employed at the facility. The potential increased employment associated with the proposed modifications would be more than off-set by the number of jobs that were eliminated in recent years. Therefore, the proposed Project modifications would not be expected to impact existing neighborhood and regional parks, or other recreational facilities.

It should be noted that the Lakewood Tank Farm is located adjacent to Davenport Park in Lakewood. As discussed above, the proposed Project would not be expected to result in the increased use or require the expansion of recreational facilities, including Davenport Park.

3.17 Transportation

Senate Bill 743 (2013) required the Governor's Office of Planning and Research (OPR) to develop alternative methods of measuring transportation impacts under CEQA. At a minimum, the new methods must apply within areas that are served by transit. Once the new transportation guidelines are adopted, automobile delay (often referred to as Level of Service or LOS analysis) generally would no longer be considered to be an environmental impact under CEQA. The OPR added CEQA Guidelines Section 15064.3 which provided that, in most cases, vehicle miles travelled is the most appropriate measure of transportation impacts. The State CEQA Guidelines and Checklist have been amended for traffic since the December 2013 Final MND was prepared to respond to SB 743.

a) *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities*

Previous Environmental Review: The December 2013 Final MND determined that rail would be the primary mode of transport for the renewables feedstocks and delivery trucks would be used if a reliable source of vegetable oil became available. The Project was expected to process 3,500 barrels of feedstock per day which translates into seven rail cars or 23 delivery trucks per day. The rail deliveries would replace existing rail car deliveries; therefore, no additional rail traffic was anticipated.

Between 2009 and 2013 the total number of trucks going to and from the Refinery declined by 8,368 trucks per year, a decline of 25.5 percent. The additional truck transport projected for the Project (a maximum of 28 trucks per day) was more than offset by the decline in such traffic since 2009. In

addition, trucks are not permitted to queue on public streets. As a result, the impacts were determined to be less than significant.

Proposed Project Modifications: *Potentially Significant Impact.*

The proposed Project modifications would increase the delivery of feedstocks by an additional 21,500 barrels per day via ship, railcar, and/or truck. The proposed modifications would require a maximum of approximately 44 railcars per day. Products (gasoline, diesel fuel, jet fuel) are expected to be transported from the renewable fuels facility via pipeline or truck which would result in an increase of between 300 to 480 trucks per day. The proposed modifications would increase rail and truck traffic above the levels evaluated in the December 2013 Final MND. Therefore, the traffic impacts associated with the proposed Project modifications would be potentially significant.

b) *Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?*

Previous Environmental Review: This is a newly added section to the CEQA checklist, so it was not evaluated in the December 2013 Final MND.

Proposed Project Modifications: *Potentially Significant Impact.*

CEQA Guidelines § 15064.3(b) generally requires that a project's transportation impacts be evaluated for CEQA purposes using vehicle miles traveled, as opposed to traffic delay (e.g., level of services). As discussed in Section 3.17 (a) above, the proposed Project modifications would require a maximum of approximately 44 railcars per day. Products (gasoline, diesel fuel, jet fuel) are expected to be transported from the renewable fuels production facility via pipeline or truck which would result in an increase of between 300 to 480 trucks per day. The proposed modifications would increase rail and truck traffic above the levels evaluated in the December 2013 Final MND. Therefore, there would be a potentially significant impact as a result of the proposed Project.

c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Previous Environmental Review: The December 2013 Final MND evaluated this impact under Section 3.16.2 (d) and determined that the Project would not affect any public streets. All of the improvements would be located within the existing Refinery. At no time would any local streets or parcels be closed to traffic.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would be located within the existing Refinery and Lakewood Tank Farm. The Proposed Project would not change the access to and from either site or introduce any new traffic configurations. The Project would not change the configuration of any intersections, resulting in sharp curves or dangerous intersections. The Project modifications also would not result in a change in land use that would result in additional land uses conflicts. Both the existing Refinery and Lakewood Tank Farm are industrial uses, and the proposed modifications are compatible with the existing

industrial uses. Therefore, there would be no impact associated with an increase in traffic hazards or incompatible uses.

d) *Would the project result in inadequate emergency access?*

Previous Environmental Review: The December 2013 Final MND evaluated emergency access under Section 3.16.2 (e) and determined that the Refinery has an existing conditional use permit (CUP) to operate the railcar-loading and unloading racks which limits the Refinery to receive 25 railcars per delivery. Mitigation measures were imposed to minimize the potential impacts for closure of Downey Avenue at the rail crossing to less than significant when railcars arrive or depart the Refinery, especially during peak traffic periods (e.g., beginning and ending of school hours):

- Mitigation Measure #9: No truck queuing or trailer drop off will be permitted on public streets.
- Mitigation Measure #10: The Refinery operators and management must continue to work with the railroad to schedule railcar delivery and pick-ups so that traffic on Paramount Boulevard and Downey Avenue is not adversely impacted.
- Mitigation Measure #11: Rail car deliveries and pick-ups will be limited to the non-peak hour traffic periods, after 10:00 am and before 6:00 pm. The Refinery operators and management will continue to work with the railroad so that train traffic to and from the Refinery does not coincide with the morning and evening commute times or when students are going to or leaving school. No deliveries during the evening, night, and early morning periods will be permitted unless prior notification to the City is provided.
- Mitigation Measure #12: The length of an individual train will generally be limited to not more than 25 railcars. In the event more cars are required, the Community Development Department must be notified 24-hours in advance. The Refinery operators will also be required to notify the Paramount Sheriff's station of the approximate delivery time.
- Mitigation Measure #13: At no time may traffic on Downey Avenue be halted more than 5 minutes during any single delivery or pick-up. In the event of a longer train (a train consisting of more than 25 cars), multiple maneuvers by the train operators may be required to stay under the 5-minute limit.
- Mitigation Measure #14: The Refinery operators and the train personnel must coordinate delivery times so the gate to the rail loading/unloading areas within the Refinery are open prior to the arrival of the train. The means as to how the gate is to be opened (automated, manual, etc.) will be determined by the Refinery management and the railroad.

Proposed Project Modifications: *Less Than Significant Impact with Mitigation.*

The proposed Project modifications would require a maximum of approximately 44 railcars per day. The Project evaluated in the December 2013 Final MND included a maximum of approximately 25 railcars per delivery. The Project modifications would not exceed this limitation and the above mitigation measures to minimize the interference with emergency access would still apply. In addition, products (gasoline, diesel fuel, jet fuel) are expected to be transported from the renewable fuels facility via pipeline or truck resulting in an increase of between 300 to 480 trucks per day. Incorporation of the

above mitigation measures would result in a less than significant impact on emergency access. Therefore, there would be a less than significant impact with the incorporation of mitigation measures.

3.18 Tribal Cultural Resources

The State CEQA Guidelines were amended in July 2015 to include evaluation of impacts on tribal cultural resources, and the CEQA Checklist has been amended since the December 2013 Final MND was prepared to specifically include tribal cultural resources. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe (Public Resources Code 21074). Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change to a Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project. AB52 identifies examples of mitigation measures that will avoid or minimize impacts to a TCR and applies to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015.

In compliance with PRC Section 21080.3.1(b), the City has provided formal notification to California Native American tribal representatives that have previously requested notification from the City regarding projects within the geographic area traditionally and culturally affiliated with the tribe. The City sent notification letters to the Fernandeano Tataviam Band of Mission Indians, Gabrieleño Band of Mission Indians – Kizh Nation, Tejon Indian Tribe, San Manuel Band of Mission Indians, and Gabrieleño/Tongva San Gabriel Band of Mission Indians (hereinafter referred to as the “Tribes”) to participate in the AB52 CEQA consultation process for projects within the City. Mr. Andrew Salas from the Gabrieleno Band of Mission Indians – Kizh Nation responded and requested formal consultation under AB52 for the proposed Project. Formal consultation has commenced.

- a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*
 - i) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

Previous Environmental Review: This topic was not directly evaluated in the December 2013 Final MND. Cultural resources were evaluated and are discussed in Section 3.5 (b) above. The December 2013 Final MND determined that no archaeological resources were likely to be discovered during excavation activities due to the previous disturbance and the limited degree of excavation that would be

required. As a result, no impacts on archaeological resources were anticipated from the proposed Project.

Proposed Project Modifications: *No Impact.*

The proposed Project modifications would continue to be located within the confines of the existing Refinery and Tank Farm. Generally, resources (buildings, structures, equipment) that are less than 50 years old are excluded from listing in the National Register of Historic Places unless they can be shown to be exceptionally important. No existing structures at the existing Refinery or Tank Farm are considered architecturally or historically significant, as defined under CEQA Guidelines §15064.5, i.e., no structures are eligible for listing in the California Register of Historical Resources or included in a local register of historic resources. The Project modifications would remove refinery structures and units; however, the buildings, structures, and equipment do not meet the eligibility criteria (e.g., associated with historically important events or people, embodying distinctive characteristics of a type, period, or method of construction), and would not yield historically important information. No structures would be demolished at the Lakewood Tank Farm. Therefore, no impacts on tribal cultural resources are expected.

- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Previous Environmental Review: This topic was not directly evaluated in the December 2013 Final MND. Cultural resources were evaluated and are discussed in 5 b.) above. The December 2013 Final MND determined that no archaeological resources were likely to be discovered during excavation activities due to the previous disturbance and the limited degree of excavation that will be required. As a result, no impacts on archaeological resources were anticipated from the proposed Project.

Proposed Project Modifications: *Potentially Significant Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. The potential for archaeological resources at the existing Refinery is low due to the character of subsurface soils (recent alluvium) and the fact that the entire site has been previously graded and developed. Grading associated with the proposed Project is expected to be limited to trenching to provide utilities to new units and grading to develop stable foundations for new units and facilities. Based on previous construction activities at the existing Refinery, no significant adverse impacts to archaeological or tribal resources are expected since no known cultural or tribal resources are located within the existing Refinery. No construction activities, including grading, trenching or other types of soil disturbance, are proposed at the Lakewood Tank Farm. The potential for significant impacts on tribal resources would be evaluated with the tribes during consultation activities; thus, there would be a potentially significant impact.

3.19 Utilities and Service Systems

The State CEQA Guidelines and Checklist have been amended for Utilities and Service Systems. The previous question a) was removed and questions b), c), h), and i) were consolidated. Question d) and f) were reworded. The modifications to the checklist resulted in fewer questions. Previous environmental review has been consolidated accordingly.

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Previous Environmental Review: The December 2013 Final MND determined that the incremental increase in water associated with the Project was approximately 285 gallons per hour or 6,840 gallons per day on average with a peak day water demand of approximately 990 gallons per hour or 23,760 gallons per day. The water demand is less than that when the Refinery was in full operation. Therefore, no new water supply infrastructure was expected. As a result, the impacts were determined to be less than significant.

The December 2013 Final MND determined that the wastewater discharge from the Project would be approximately 14 gallons per minute (gpm) or 15,840 gallons per day on average, with approximately 9 gpm from the first stage of the process and approximately 5 gpm from steam condensate. The peak day wastewater discharge was expected to be approximately 25.5 gpm or 36,720 gallons per day, with approximately 9 gpm from the first stage of the process and approximately 16.5 gpm from steam condensate. The additional wastewater discharge was within the industrial discharge permit limit for the Refinery. The peak effluent generation would not be any greater than that of the existing Refinery. As a result, no new off-site facilities were required to treat the projected flows and the impacts were determined to be less than significant.

The 2013 Final MND determined that the water consumption rates, and the peak effluent generation would not be any greater than that of the existing generation. No new off-site wastewater facilities would be required to treat the projected flows. As a result, no environmental impacts would occur.

The 2013 Final MND determined that the projected storm water runoff is not anticipated to increase due to the Project because the location and extent of impervious surfaces at the Refinery would not change. The Project would not lead to any changes in the hydrologic characteristics of any nearby drainage. No additional impervious surfaces were proposed as part of the Project. Therefore, no new stormwater management facilities would be necessary. As a result, no significant impacts were anticipated.

The 2013 Final MND determined that electricity and natural gas are provided by local utilities and that early coordination with these utility companies would ensure adequate and timely service to the Project.

Both utilities currently provide service in the area. Thus, no new facilities would be needed and no significant adverse impacts on power and natural gas services would result from implementation of the proposed Project.

The 2013 Final MND determined that the existing telephone lines in the surrounding area would be unaffected by the Project. Therefore, no significant adverse impacts on communication systems were anticipated.

Proposed Project Modifications: *Potentially Significant Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. As discussed in Section 3.10 (b) above, the proposed modifications to the Renewable Fuels Project include the construction of several new units that would require additional water including the PreTreat Unit and the new Hydrogen Generation Unit. While water is currently provided to the existing Refinery, the increase in water use may be substantial and could exceed one million gallons per day. Therefore, the proposed modifications would increase the water use and potentially impact the water supply, and there would be a potentially significant impact.

As discussed in Section 3.10 (a) above, the proposed modifications to the Renewable Fuels Project include the construction of several new units that would generate additional wastewater including the PreTreat Unit, wastewater treatment facilities to support the Pretreat Unit, a new Sour Water Stripper, and a new Hydrogen Generation Unit. All of these facilities would generate additional wastewater that would require treatment in the existing wastewater treatment plant. The increase in wastewater discharge associated with the proposed modifications would be up to approximately 642,000 gallons per day (446 gpm), which would be well above the wastewater discharge evaluated in the December 2013 Final MND. While the Refinery has existing wastewater treatment equipment, the equipment would be modified to treat an increase in wastewater generated by the Project modifications. In addition, the existing industrial wastewater discharge permit would need to be modified with the Los Angeles County Sanitation District Department. Therefore, the proposed Project would increase the facility's wastewater discharged, require additional wastewater treatment facilities, and require modifications to the wastewater discharge permit; there would be potentially significant impacts as a result of the proposed Project.

As discussed in Section 3.10 (d) above, the Project modifications are not expected to result in the construction of additional impervious surfaces, since the existing Refinery is developed and urbanized. Rainwater and surface runoff are controlled in the existing facility process areas, collected, and treated. Therefore, the Project modifications are not expected to result in an increase in storm water or require new storm water drainage facilities or the expansion of existing storm water facilities. As a result, the currently proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to alteration of existing storm water systems; therefore, there would be no impact on stormwater systems.

As discussed in Section 3.6 (a) above, the proposed Project modifications would require an estimated 18.1 megawatts of electricity. As part of the Project modifications, AltAir may re-start the existing cogeneration unit, producing the additional electricity required to operate the new renewable fuels facilities on-site and would not require the increase in purchased electricity from a public utility company.

An estimated maximum increase of 31 million standard cubic feet per day of natural gas is expected to be required for the proposed modifications, the majority of which would be used in the new Hydrogen Generation Unit. The additional use of natural gas would assist in producing additional quantities of renewable fuels that meet the Low Carbon Fuel Standard. Further, the proposed Project would generate additional quantities of renewable refinery fuel gas that would replace a portion of the natural gas that would be required by modifications to the Renewable Fuels Project. Therefore, the proposed Project would not use non-renewable resources in a wasteful or inefficient manner. As a result, the proposed modifications would not alter the conclusions from the December 2013 Final MND with respect to energy (as evaluated in utility and service system impacts). Natural gas is delivered to the existing Refinery by Southern California Gas Company upon demand and would continue to do so in the future. Early coordination with the Gas Company would ensure adequate and timely service to the Project. Both utilities currently provide service in the area and are expected to continue to provide service to the area.

The existing Refinery currently has communication systems in place, including telephone and internet systems. The proposed modifications would not require new or expanded telephone or internet systems. Therefore, the proposed Project would have no impacts on communication systems.

b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

Previous Environmental Review: As discussed in Section 3.19 (a) above, the water demand was expected to be less than when the Refinery was in full operation. Therefore, water supply was expected to be available. As a result, the impacts were determined to be less than significant.

Proposed Project Modifications: *Potentially Significant Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. As discussed in Section 3.10 (b) above, the proposed modifications to the Renewable Fuels Project include the construction of several new units that would require additional water, including the PreTreat Unit and the new Hydrogen Generation Unit. While water is currently provided to the existing Refinery, the increase in water use may be substantial and could exceed one million gallons per day. Therefore, the proposed Project would have a potentially significant impact on water supplies.

- c) *Would the project 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?*

Previous Environmental Review: As discussed in Section 3.19 (a) above, the additional wastewater discharge was within the industrial discharge permit limit for the Refinery. The peak effluent generation would not be any greater than that of the existing Refinery. As a result, no new off-site facilities were required to treat the projected flows and the impacts were determined to be less than significant.

Proposed Project Modifications: *Potentially Significant Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. As discussed in Section 3.10 (a) above, the proposed modifications to the Renewable Fuels Project include the construction of several new units that would generate additional wastewater including the PreTreat Unit, wastewater treatment facilities to support the Pretreat Unit, a new Sour Water Stripper, and a new Hydrogen Generation Unit. All of these facilities would generate additional wastewater that would require treatment in the Refinery's wastewater treatment plant. The increase in wastewater discharge associated with the Project modifications would be up to approximately 642,000 gallons per day (446 gpm), which would be well above the wastewater discharge evaluated in the December 2013 Final MND. While the Refinery has existing wastewater treatment equipment, the equipment would be modified to treat an increase in wastewater generated by the Project modifications. In addition, the existing industrial wastewater discharge permit would need to be modified with the Los Angeles County Sanitation District Department. Therefore, the Project modifications would increase the wastewater discharged, require additional wastewater treatment facilities, and require modifications to the wastewater discharge permit. Therefore, there would be a potentially significant impact as a result of the Project.

- d) *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Previous Environmental Review: The December 2013 Final MND determined that the Project contributed to two existing waste streams at the Refinery: spent caustic and spent catalyst. The caustic scrubbing system is permitted as a backup for the refinery fuel gas treating system so the use by the Project will not require an increase in capacity of generate more spent caustic than the Refinery has in the past. Truck shipments of caustic were expected to occur approximately once every two weeks for a total of 26 shipments per year and 650 tons per year of spent caustic sent for recycling. The spent catalyst would be changed out once a year and generate approximately 35 tons of waste that would also be sent for recycling. As a result, the potential impacts on landfills would be less than significant.

Proposed Project Modifications: *Potentially Significant Impact.*

All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. The proposed modifications may result in an

increase in solid and hazardous waste associated with contaminated soil, catalyst, caustic, and Pretreat solids. The proposed modifications would result in an increase in solid and hazardous waste over what was evaluated in the December 2013 Final MND. Therefore, there would be a potentially significant impact associated with the generation of solid waste.

- e) ***Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

Previous Environmental Review: The December 2013 Final MND determined that the Project's operation will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no significant adverse impacts related to State and local statutes governing solid waste were anticipated.

Proposed Project Modifications: *Less Than Significant Impact.*

While the proposed Project modifications are expected to increase the amount of solid and hazardous waste generated by the renewable fuels production facility, the facility would be required to adhere to federal, state and local regulations with respect to waste handling, treatment, documentation, waste reduction and recycling, transportation, and ultimate disposal. Therefore, no significant adverse impacts related to State and local statutes governing solid waste are anticipated.

3.20 Wildfire

The State CEQA Guidelines were amended in July 2015 and the CEQA Checklist has been amended since the December 2013 Final MND was prepared to specifically include a separate section on wildfire impacts. Nonetheless, the potential for wildfires were addressed in the December 2013 Final MND under Hazards.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

- a) ***Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?***

Previous Environmental Review: As discussed in Section 3.9 (g) above the December 2013 Final MND determined that the Project would not result in any arterials being closed to traffic during the Project's construction and subsequent operation. As a result, no significant adverse impacts to emergency response plans were anticipated.

Proposed Project Modifications: *No Impact.*

As discussed in Section 3.9 (g) above, the proposed Project modifications would not impair implementation or physically interfere with an emergency response plan or emergency evacuation plan. The Project modifications would result in modifications to the existing Refinery; however, all construction activities would occur within the confines of the existing Refinery so no emergency response plans at other facilities would be impacted. The Refinery has prepared, adopted, and implemented emergency response plans at its facility. The emergency response plans would need to be

updated following completion of construction activities associated with the renewable fuels production facility. The Project modifications are not expected to alter the route that employees would take to evacuate the site, as the evacuation routes generally direct employees outside of the main operating portions of the facility. Therefore, there would be no impact associated with emergency response plans.

- b) *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Previous Environmental Review: As discussed in Section 3.9 (h) above, the December 2013 Final MND determined that the area surrounding the Refinery is developed and there were no areas containing natural vegetation that could lead to a wildfire. As a result, there were no impacts associated with potential wildfires from off-site locations.

Proposed Project Modifications: *No Impact.*

As discussed in Section 3.9 (h) above, the proposed modifications would not increase the existing risk of fire hazards in areas with flammable brush, grass, or trees. The Project modifications would not expose people or structures to wildland fires. Further, the existing Refinery is not located in an area where residences are intermixed with wildlands. No substantial or native vegetation exists within the operational portions of the existing Refinery. Therefore, the Project modifications would not impact people or structures due to fire hazards from wildland fires.

3.21 Mandatory Findings of Significance

- a) *Does the project have the potential to substantially 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, substantially 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?*

No Impact. As discussed in Section 3.4, Biological Resources; Section 3.5, Cultural Resources; and Section 3.18, Tribal Cultural Resources, the proposed Project is not expected to result in significant impacts to biological, cultural, or tribal cultural resources. Therefore, the proposed Project would not 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 will cause substantial adverse effects on human beings, either directly or indirectly?*

Potentially Significant Impact. As addressed throughout this Initial Study, the proposed Project would have no impact, a less-than-significant impact, a less-than-significant impact with mitigation incorporated, or a potentially significant impact as indicated for each issue area.

Several impact areas (i.e., Section 3.2, Agricultural and Forestry Resources; Section 3.4, Biological Resources; Section 3.6, Energy; Section 3.11, Land Use and Planning; Section 3.12, Mineral Resources; Section 3.14, Population and Housing; Section 3.16, Recreation; and Section 3.20, Wildfire) were determined to have a less-than-significant or no impact compared to existing conditions, and, thus, the proposed Project would not contribute to cumulative impacts related to these environmental topics. Other impact areas (i.e., Section 3.5, Cultural Resources; Section 3.7, Geology and Soils; Section 3.9, Hazards and Hazardous Materials, and Section 3.18, Tribal Cultural Resources) are by their nature site-specific, and impacts at one location do not add to impacts at other locations or create additive impacts.

The following issue areas have the potential for cumulative adverse environmental impacts: Section 3.1, Aesthetics; Section 3.3, Air Quality; Section 3.8, Greenhouse Gas Emissions; Section 3.10, Hydrology and Water Quality; Section 3.13, Noise; Section 3.17, Transportation; and Section 3.19, Utilities and Service Systems. These impact areas with potentially significant cumulative impacts would potentially cause substantial adverse effects on human beings, either directly or indirectly. The proposed Project is expected to result in increased emissions, a change to the visual character of the area, a change in hazard impacts, water supply, wastewater treatment facilities, noise sources, waste generation, and traffic, all of which may result in cumulative impacts. Therefore, the proposed Project may result in cumulatively considerable impacts as well as substantial adverse effects on human beings.

References

PERSONS CONSULTED AND REPORT PREPARERS

MRS Environmental Inc.
Nicole Trezza, Planner
Greg Chittick, Senior Engineer
Luis Perez, Project Manager

John Carver, City of Paramount Planning Director
Kathryn Gleeson, World Energy

REFERENCES

Paramount, 2007. Final Paramount General Plan. Adopted August 7, 2007. Available at:
<http://www.paramountcity.com/home/showdocument?id=2538>

Paramount, 2013. Mitigated Negative Declaration and Initial Study, Conditional Use Permit (CUP) 757 and Zone Variance (ZV), Paramount Petroleum Alt Air Project. Adopted December 30, 2013, Revised per Addendum May 14, 2014. (PARA 059)

Paramount, 2014. Addendum to Mitigated Negative Declaration and Initial Study, Conditional Use Permit (CUP) 757 and Zone Variance (ZV), Paramount Petroleum Alt Air Project. Adopted November 10, 2014. (PARA 066)

SCAQMD, 2016. Final 2016 Air Quality Management Plan. March 2017. Available at
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DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

July 7, 2020

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

RE: Paramount Petroleum Alt-Air
Renewable Fuels Project – Notice
of Preparation (NOP)
SCH # 202006901
GTS # 07-LA-2020-03279
Vic. LA-19/PM: 7.653

Dear John Carver:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-mentioned project's Notice of Preparation (NOP). The modifications to the Renewable Fuels Project will convert the Paramount crude oil refinery into a renewable fuels production facility, eliminating the refining of crude oil. The project modifications will include a new Pretreat Unit, modifications to the existing Renewables Fuels Units, a new Renewable Fuels Unit, a new Hydrogen Generation Unit, a new Hydrogen Recovery Unit, a new Propane Recovery Unit, upgrades to the existing wastewater treatment system, a new Hydrogen Sulfide Recovery Unit, a second Sour Water Stripper, a new flare, modifications to the truck and rail loading/unloading racks, and new pipelines within the facility. In addition, some existing tanks will be upgraded/repared and be permitted to handle different products (e.g., non-edible vegetable oils and beef tallow). The Project also includes utilizing two existing 55,000-barrel storage tanks at the Lakewood Tank Farm.

Under Senate Bill 743 (2013), CEQA review of transportation impacts of a proposed development are adapting to eliminate consideration of delay-and capacity-based metrics such as level of service (LOS) and are instead focusing analysis on another metric of impact, "Vehicle Miles Traveled (VMT)". Effective July 1st, 2020, Caltrans is replacing LOS with VMT when evaluating traffic impacts.

For any future project, like the proposed SEIR, we encourage the Lead Agency to adopt or develop a verifiable performance-based Vehicle Miles Travelled (VMT) criteria as required by SB 743.

After reviewing the project's NOP Caltrans has the following comments:

- The NOP indicates that a potentially significant impact may occur to the transportation/circulation system. In the future SEIR please consider including a Construction Traffic Management Plan and Truck Haul Route Program for Caltrans approval.

- Please consider including a VMT analysis that looks at potential safety concerns to Caltrans facilities as part of the proposed SEIR.
- If the project develops VMT analysis please consider utilizing the latest version of the Technical Advisory and Guidelines on Evaluating Transportation Impacts in CEQA by the Governor's Office of Planning and Research, and the latest version of Caltrans' Transportation Impact Study Guide (TISG).
- Please consider scheduling the construction working hours during off peak hours to the maximum extent possible. This may minimize congestion and provide higher levels of safety to the pedestrians and vehicular traffic on the streets and freeway.

Further information included for your consideration:

Please consider integrating transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use.

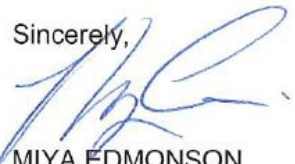
Caltrans seeks to promote safe, accessible multimodal transportation. Methods to reduce pedestrian and bicyclist exposure to vehicles improves safety by lessening the time that the user is in the likely path of a motor vehicle. Caltrans recommends the project consider the use of methods such as, but not limited to, the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Additionally, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

Also, storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water. Discharge of storm water run-off is not permitted onto State Highway facilities without a storm water management plan.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at reece.allen@dot.ca.gov and refer to GTS# 07-LA-2020-03279

Sincerely,


MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

From: [John Carver](#)
To: [Luis Perez](#)
Subject: FW: Comments on NOP for Paramount Petroleum AltAir Renewable Fuels Project
Date: Tuesday, July 7, 2020 5:36:47 PM

Hi Luis – comment from City of Bellflower.

From: Duane Morita [mailto:dmorita@bellflower.org]
Sent: Tuesday, July 7, 2020 5:35 PM
To: John Carver <JCarver@paramountcity.com>
Cc: Elizabeth Corpuz <ecorpuz@bellflower.org>
Subject: Comments on NOP for Paramount Petroleum AltAir Renewable Fuels Project

Dear Mr. Carver:

The City of Bellflower appreciates the opportunity to review the NOP and provide recommendations on the EIR's scope. The City requests that the EIR evaluate potential impacts to those City of Bellflower streets that neighbor the project site across of Lakewood Boulevard. Upon completion, the City also requests that a copy of the Draft EIR be emailed or mailed to:

Elizabeth Corpuz
Director of Planning and Building Services
City of Bellflower
16600 Civic Center Drive
Bellflower, CA 90706
(562) 804-1424 ext. 2276
ecorpuz@bellflower.org

Thank you,

Duane Morita
City of Bellflower

The information contained in this e-mail message is information protected by the attorney-client and/or the attorney/work product privileges. It is intended only for the use of the individual or individuals named above, and the privileges are not waived by virtue of this having been sent by e-mail. If the person actually receiving this message or any other reader of the message is not the named recipient or the employee or agent responsible to deliver it to the named recipient, any use, dissemination, distribution, or copying of the communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone at (562) 220-2027 or email us at crequest@paramountcity.com.



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

July 15, 2020

Ref. DOC 5759221

Mr. John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

Dear Mr. Carver:

NOP Response for Paramount Petroleum AltAir Renewable Fuels Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on June 15, 2020. The proposed project is located within the jurisdictional boundary of District No. 2. We offer the following comment:

- The proposed project may require an amendment to a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section in order to reach a determination on this matter. If this update is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacsd.org.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: J. Kilgore



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

July 7, 2020

JCarver@paramountcity.com

John Carver, Director
City of Paramount, Planning Department
16400 Colorado Avenue
Paramount, CA 90723

Notice of Preparation of a Draft Subsequent Environmental Impact Report for the Paramount Petroleum AltAir Renewable Fuels Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Subsequent Environmental Impact Report (SEIR). Please send a copy of the Draft SEIR upon its completion and public release directly to South Coast AQMD at the address shown in the letterhead. Note that copies of the Draft SEIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. **In addition, please send with the Draft SEIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Responsible Agency and South Coast AQMD Permits

South Coast AQMD is a Responsible Agency for the Proposed Project (CEQA Guidelines Section 15381) since implementation of the Proposed Project requires permits from South Coast AQMD. It is important to note that the assumptions in the air quality analysis in the Final SEIR will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. In order to ensure that impacts from the permits are fully and adequately evaluated as required under CEQA Guidelines Section 15096(b), it is recommended that the Lead Agency initiate consultation with South Coast AQMD by contacting Jillian Wong, Ph.D., Planning and Rules Manager and Bhaskar Chandan, P.E., Senior Air Quality Engineering Manager.

CEQA Air Quality Analysis

South Coast AQMD adopted its CEQA Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. It is recommended that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds² and localized significance thresholds (LSTs)³ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁴. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance⁵ on strategies to reduce air

² South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

³ Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

⁴ Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁵ In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

If the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 “Mitigating the Impact of a Project” of South Coast AQMD’S *CEQA Air Quality Handbook* and South Coast AQMD’s web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- California Air Pollution Control Officers Association’s (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD’s Public Information Center at (909) 396-2001 or at South Coast AQMD’s website at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated to the extent feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

VT:JW:LS

LAC200623-07

Control Number

Location of Comment Discussion in Draft SEIR

Commenting Agency	Comment	Location of Comment Discussion in Draft SEIR
California Department of Transportation	The NOP indicates that a potentially significant impact may occur to the transportation/circulation system. In the future SEIR please consider including a Construction Traffic Management Plan and Truck Haul Route Program for Caltrans approval.	Section 4.8
California Department of Transportation	Please consider including a VMT analysis that looks at potential safety concerns to Caltrans facilities as part of the proposed SEIR.	Section 4.8
California Department of Transportation	If the project develops VMT analysis please consider utilizing the latest version of the Technical Advisory and Guidelines on Evaluating Transportation Impacts in CEQA by the Governor's Office of Planning and Research, and the latest version of Caltrans' Transportation Impact Study Guide (TISG).	Section 4.8
California Department of Transportation	Please consider scheduling the construction working hours during off peak hours to the maximum extent possible. This may minimize congestion and provide higher levels of safety to the pedestrians and vehicular traffic on the streets and freeway.	Section 4.8
City of Bellflower	The City requests that the EIR evaluate potential impacts to those City of Bellflower streets that neighbor the project site across of Lakewood Boulevard.	Section 4.8
Los Angeles County Sanitation Districts	The proposed project may require an amendment to a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section in order to reach a determination on this matter. If this update is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction.	Section 4.10
South Coast Air Quality Management District	South Coast AQMD is a Responsible Agency for the Proposed Project (CEQA Guidelines Section 15381) since implementation of the Proposed Project requires permits from South Coast AQMD. It is important to note that the assumptions in the air quality analysis in the Final SEIR will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. In order to ensure that impacts from the permits are fully and adequately evaluated as required under CEQA Guidelines Section 15096(b), it is recommended that the Lead Agency initiate consultation with South Coast AQMD by contacting Jillian Wong, Ph.D., Planning and Rules Manager and Bhaskar Chandan, P.E., Senior Air Quality Engineering Manager.	Section 4.2
South Coast Air Quality Management District	South Coast AQMD adopted its CEQA Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. It is recommended that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993) . South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical	Section 4.2

Commenting Agency	Comment	Location of Comment Discussion in Draft SEIR
	land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com .	
South Coast Air Quality Management District	South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds and localized significance thresholds (LSTs) to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.	Section 4.2
South Coast Air Quality Management District	The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine the level of significance.	Section 4.2
South Coast Air Quality Management District	If the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.	Section 4.2