City of Pittsburg
Planning Commission Agenda

07/22/2025

City Hall Council Chamber
65 Civic Avenue, Pittsburg, CA 94565

Regular Meeting
7:00 P.M.

Planning Commission Members

Sarah Foster, Chair
Donna Smith, Vice-Chair
Elissa Robinson, Commissioner
Frank Gordon, Commissioner
Deandra Stokes, Commissioner
Ivelina Popova, Commissioner
Reily Kent, Commissioner

Any member of the public who wishes to address the Commission should complete a Speaker's Card, available on the public counter below the dais. Please note on the card the agenda item number, or, for items not listed on this agenda, a brief description of the issue on which you would like to address the Commission. Give the completed form to the Minutes Clerk or a staff member, who will give the card to the Commission Chair. The Chair will invite the speaker(s) to the podium at the appropriate time during the meeting. Each individual will be given three minutes to address the Commission, unless additional time is allowed as provided for spokespersons. Prior to speaking, each speaker is requested to state his or her name and business and city of residence in a clear and audible tone of voice. For items listed under the "Public Hearings" or "Commission Consideration" portions of this agenda, the public hearing or public comment period will follow a brief presentation on the item by Planning Department staff and/or the project applicant.

A decision by the Planning Commission is not final until the appeal period expires 10 calendar days after the date the decision occurred. The applicant, City Council member(s), City Manager, or any affected person may appeal the denial, approval, recommendation, or any condition of approval of an item within the 10-day appeal period. A completed appeal form and the applicable filing fee must be filed with the City Planner, 65 Civic Avenue, Pittsburg. The appeal form must include the name and address of the appellant and state the reasons for the appeal. The appeal will be set for City Council consideration and appropriate public notification given.

The Commission requests that you refrain from disruptive conduct during the meeting and that you observe the order and decorum of the Council Chamber. Please turn off or set to vibrate all cellular phones, and refrain from making personal, impertinent or slanderous remarks. Boisterous or disruptive behavior while the Commission is in session, and the display of signs in a manner that violates the rights of others or prevents others from watching or fully participating in the Planning Commission meeting is considered counterproductive and will not be tolerated, and the Commission Chair can order any person who engages in such conduct to leave the Council Chamber.

This agenda was posted in City Hall on Friday, July 18, 2025

CALL TO ORDER

ROLL CALL

PLEDGE OF ALLEGIANCE

DELETIONS, WITHDRAWALS OR CONTINUANCES

COMMENTS FROM THE AUDIENCE

CONSENT

1. **Minutes**
   Minutes of June 24, 2025

PUBLIC HEARINGS

2. **Consideration of a Resolution Granting approval of a Use Permit to Establish an Animal Grooming Facility at 268 Atlantic Avenue, AP-25-0060 (UP).**
   This is a public hearing on a request for approval of a Use Permit to establish an Animal Grooming facility within the multi-tenant space located at 268 Atlantic Avenue, in the CC (Community Commercial) Zoning District. Assessor's Parcel No. 088-121-028.

   This proposal is categorically exempt from the requirements of the California Environmental Quality Act (CEQA) under Class 1, 'Existing Facilities' of the CEQA Guidelines, Section 15301, as the business would occupy an existing commercial tenant space with no expansion of the building footprint or change in intensity of land use.

3. **Consideration of a Resolution Granting approval of a Use Permit to include ancillary sales of distilled spirits in conjunction with an existing beer and wine sales license for an existing ARCO and AM/PM convenience store, AP-23-0062 (UP).**
   This is a public hearing on a request for approval of a Use Permit to allow for the sale of distilled spirits in conjunction with the sale of beer and wine, at an existing convenience store. The convenience store is located at 2102 West Leland Road, in the CS (Service Commercial) District. Assessor's Parcel No. 091-050-038.

   This proposal is categorically exempt from the requirements of the California Environmental Quality Act (CEQA) under Class 1, 'Existing Facilities' of the CEQA Guidelines, Section 15301.

4. Consideration of a Resolution Granting a Use Permit and Design Review and adoption of an Initial Study/Mitigated Negative Declaration and Mitigation Monitoring Reporting Program for the Pencco Iron Salts Manufacturing Facility, AP-23-0167 (UP, DR)

The proposed project consists of two applications, for a Use Permit and Design Review for the construction and operation of an iron salts (water treatment and purification product) manufacturing facility at the Corteva industrial complex located at 901 Loveridge Road. The parcel (073-220-049, Lot L8) is zoned General Industrial (IG) and is designated Industrial in the 2040 General Plan.

Environmental Determination: On January 22, 2025, staff published and circulated an Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed project. The Initial Study found the project would have less-than-significant impacts in the areas of Aesthetics, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazardous Materials, Hydrology and Water Quality, Public Services, Transportation and Traffic, Tribal Cultural Resources, and Utilities and Service Systems. The Initial Study found the project would have no impacts in the areas of Agricultural and Forestry Resources, Biological Resources, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Recreation, and Wildfire. The Initial Study found the project would have less-than significant impacts with mitigation provided in the area of Air Quality. As such, a Mitigation Monitoring Reporting Program (MMRP) that identifies the mitigation measures being proposed has been prepared for adoption by the Planning Commission.

ZONING ADMINISTRATOR REPORTS

5. Notice of Intent to Exercise Delegated Design Review Authority

The Zoning Administrator submits one notice of intent to exercise delegated design review authority for:

1) An application filed by Steve Proo, on behalf of AT&T, requesting Administrative Design Review and Minor Modification approval to install new equipment for a wireless facility (collocation) on an existing 94’ PG&E lattice tower located at 107 Greenmeadow Circle, Assessor’s Parcel No. 093-320-068.

STAFF COMMUNICATIONS

COMMITTEE REPORTS

ADJOURNMENT OF PLANNING COMMISSION MEETING

NOTICE TO PUBLIC

NOTICE TO THE DISABLED AND VISUALLY OR HEARING IMPAIRED

In compliance with the Americans with Disabilities Act, the city of Pittsburg will provide special assistance for disabled citizens. Upon request, an agenda for any meeting shall be made available in appropriate alternative formats. The Council Chamber is equipped with sound amplifier units for use by the hearing impaired. The units operate in conjunction with the Chamber's sound system. You may request the sound amplifier from the City Clerk for personal use during Commission meetings. If you need special assistance to participate in this meeting, or are requesting a specially formatted agenda, please contact the City Clerk at 925-252-4850. Notification 48 hours prior to the meeting will enable the city to make reasonable arrangements to ensure accessibility to this meeting or provide the requested agenda format. (28 CFR 35.102-35.104 ADA Title II)

GENERAL INFORMATION

Copies of the open session agenda packets that are distributed to the Planning Commission are on file in the office of the Planning Department, 65 Civic Avenue, Pittsburg, California, and are available for public inspection, beginning no fewer than 72 hours in advance of the meeting, during normal business hours (8:00 a.m. – 5:00 p.m., Monday through Friday, except city holidays). Additionally, if any reports or documents that are public records are distributed to the Planning Commission fewer than 72 hours before the meeting, those reports and documents will also be available for public inspection in the city's Planning Department and at the Commission meeting. The Pittsburg Library is also provided a full agenda packet for your convenience. As a courtesy, the agenda is also located on the city's website at pittsburgca.gov

MINUTES
OF A REGULAR MEETING
OF THE
PITTSBURG PLANNING COMMISSION

June 24, 2025

A regular meeting of the Pittsburg Planning Commission was called to order by Chair Foster at 7:00 p.m. on Tuesday, June 24, 2025, in the Council Chambers at City Hall, 65 Civic Avenue, Pittsburg, California.

ROLL CALL

Present: Chair Foster, Commissioners Kent, Robinson, Stokes

Absent: Vice-Chair Smith, Commissioners Gordon, Popova

Staff: Assistant Director of Community and Economic Development John Funderburg, Administrative Analyst II Natasha Farmer, Administrative Analyst I Candace Hatch

PLEDGE OF ALLEGIANCE

Commissioner Robinson led the Pledge of Allegiance.

DELETIONS / WITHDRAWALS / CONTINUANCES

1. Consideration of a Resolution Granting a Use Permit and Design Review and adoption of an Initial Study Mitigated Negative Declaration and Mitigation Monitoring Reporting Program for the Pencco Iron Salts Manufacturing Facility, AP-23-0167 (UP, DR)

   Staff requested a continuance on behalf of the project applicant on this item to a date specific of July 22, 2025

COMMENTS FROM THE AUDIENCE

Public comment was made by Alaura McGuire and Mark Mallner on item #1 that was continued.

CONSENT ITEM

1. Minutes
   Minutes of May 27, 2025

On a motion by Commissioner Robison, approving the consent item(s), seconded by Commissioner Stokes:

AYES:	Foster, Kent, Robinson, Stokes
NAYES:	None
ABSTAIN:	None
ABSENT:	Gordon, Popova, Smith

PRESENTATION

2. A presentation was made to the Planning Commission by Natasha Famer on the Urban Forest Management Plan.

PUBLIC HEARING

3. Public Hearing on a Recommendation by the Planning Commission to the City Council for Adoption of a Resolution for an Approved Tree List for new development projects.

A public hearing was held requesting the recommendation to the City Council for the Adoption of a Resolution for an Approved Tree List for new development projects.

Administrative Analyst with Public Works Natasha Farmer gave a presentation.
Chair Foster opened the public hearing.
There being no public comments at this time, Chair Foster closed the public hearing item.

On a motion by Commissioner Robinson, approving the request for recommendation to the City Council for Adoption of a Resolution for an Approved Tree List for new development projects seconded by Commissioner Kent:

AYES:	Foster, Kent, Robinson, Stokes
NAYES:	None
ABSTAIN:	None
ABSENT:	Gordon, Popova, Smith

ZONING ADMINISTRATOR REPORTS

The Zoning Administrator submitted on notice of intent to exercises Delegated Design Review Authority.

STAFF COMMUNICATIONS

Secretary Funderburg informed the Planning Commission that there are no items schedule for the July 8, 2025, meeting and announced that the meeting will be cancelled.

Secretary Funderburg informed the Planning Commission that item #1, Pencoo Iron Salts Manufacturing Facility that had been continued during this meeting will be presented to the Commission at the July 22, 2025 meeting.

Three (3) additional items to tentatively be presented at the July 22, 2025, meeting:

1. AM/PM Market – Use Permit application to allow for the sale of distilled spirits in conjunction with the sale of beer, wine at an existing conveniences store. The convenience store is located at 2102 W. Leland Road, in the CS (Service Commercial) District. Assessor's Parcel No. 091-050-038

2. Flawless Collective – Use Permit for a full-service spa and beauty collective. The business will be located at 635 Railroad Avenue, in the CP) Pedestrian Commercial) District.

3. Mixed Use Project – 3 year Time Extension requested for a Design Review application to construct a new 5,214 square-foot mixed-use development that entails three (3) three-bedroom residential unites and a 1,371 square-foot ground floor commercial space on a vacant 6,135 square0-foot parcel located at the southwest corner intersection of East 10th Street and Los Medanos Street in the CSD (Downtown Service Commercial District) zone and the CS Service Commercial General Plan classification. Assessor's Parcel No. 085-205-011, AP-22-0102 East 10th Street – Two Year Time Extension

Secretary Funderburg provided an update to the Planning Commission on the Development Title Update meetings and the item will be presented in a joint meeting with the City Council to go over the feedback and comments received during the community outreach.

Secretary Funderburg mentioned the upcoming firework show that is being held at the Pittsburg Marina on July 4, 2025.

There were no further staff communications.

COMMITTEE REPORTS

Chair Foster provided an update on the TransPlan Subcommittee and Commissioner Robinson provided an update on the Community and Economic Development Subcommittee.

ADJOURNMENT

The meeting was adjourned at 8:15 p.m. to July 22, 2025.

Respectfully Submitted,

_____
John Funderburg, Secretary

CITY OF PITTSBURG
PLANNING COMMISSION
STAFF REPORT
July 22, 2025

ITEM: Consideration of a Resolution Granting approval of a Use Permit to Establish an Animal Grooming Facility at 268 Atlantic Avenue, AP-25-0060 (UP).

ORIGINATED BY:

Mariana de Lopez, 268 Atlantic Avenue, Pittsburg, CA 94565

SUBJECT:

This is a public hearing on a request for approval of a Use Permit to establish an Animal Grooming facility within the multi-tenant space located at 268 Atlantic Avenue, in the CC (Community Commercial) Zoning District. Assessor's Parcel No. 088-121-028.

RECOMMENDATION:

Staff recommends the Planning Commission adopt a Resolution (Attachment 1) approving Use Permit Application No. AP-25-0060 (UP), subject to conditions.

BACKGROUND:

On June 25, 2025, the applicant filed Planning Application No. 25-0060, requesting to approval of a Use Permit to establish an "Animal Grooming" facility within the multitenant building located at 268 Atlantic Avenue, within the Atlantic Plaza Shopping Center.

PROJECT DESCRIPTION:

Existing Conditions: The subject property is located within the Atlantic Plaza Shopping Center, a developed commercial area within the City, located at 268 Atlantic Avenue. The shopping center consists of multiple tenant spaces for commercial operators, within a single-story structure and is surrounded by existing commercial uses and associated shared customer and employee parking. The specific tenant space proposed for the Animal Grooming use is 1,464 square feet in size and currently vacant. No exterior building modifications or new landscaping are proposed in association with this application.

See Attachment 2 for site photos.

Surrounding Land Uses:

North: Atlantic Plaza Shopping Center; Atlantic Avenue
West: Atlantic Plaza Shopping Center; Railroad Avenue

South: Contra Costa Water District Canal
East: Atlantic Plaza Shopping Center; Harbor Street

See Attachment 3 for a map of surrounding uses.

Use Permit Request: The applicant is proposing to establish an "Animal Grooming" use within a 1,464-square-foot tenant space located in an existing multi-tenant commercial building within the Atlantic Plaza Shopping Center. The interior layout of the proposed grooming facility is designed to accommodate the full range of grooming services in a functional and efficient manner. It includes a designated customer waiting and check-in area at the front of the space to facilitate client drop-off and pick-up, a dedicated grooming area where pet grooming services such as hair cutting and brushing would occur, and a separate pet washroom equipped with a washtub capable of accommodating two dogs at a time. Additionally, the facility would include an office, an employee break room, a private employee-only restroom, and a crate room designed to temporarily house up to eight animals in individual enclosures while they await grooming or pickup.

The proposed Animal Grooming facility would not include any provisions for overnight boarding or extended animal stays, and as such, the business would operate strictly as a daytime, appointment-based grooming service. This operational model is consistent with the definition of "Animal Grooming" under the Pittsburg Municipal Code Section 18.08.080(3)(b), which distinguishes grooming from other animal-related uses such as kennels or veterinary boarding.

The business is proposed to operate five days a week (Monday, Tuesday, Thursday, Friday, and Saturday from 8:00 A.M. to 5:00 P.M.) and remain closed on Wednesdays and Sundays. Initially, the grooming facility will be solely operated by the applicant; however, as the business grows, additional staff may be hired to meet customer demand. All customer and employee parking needs will be met by the existing off-street parking spaces within the Atlantic Plaza Shopping Center, which is designed to support multiple commercial tenants and has sufficient capacity to accommodate the proposed use.

See Attachment 4 for site and floor plan.

GENERAL PLAN/CODE COMPLIANCE:

General Plan: The project site is designated as "Community Commercial" in the 2040 General Plan. This land use designation allows for a wide range of retail, service, and office uses intended to serve the community at large. The use classification "Animal Grooming" is consistent with the intent of the "Community Commercial" designation in that it offers a personal service similar to hair salons, nail shops, and other service-based tenants.

Zoning: The project site is located in the Community Commercial (CC) Zoning District. Pursuant to Pittsburg Municipal Code (PMC) Section 18.54.020, Animal Grooming is a conditionally permitted use within multi-tenant commercial centers in the CC District, subject to approval of a Use Permit by the Planning Commission.

Required Use Permit Findings: In accordance with PMC Section 18.16.040, a Use Permit may be granted only if the Planning Commission can make findings that the proposed use:

1. is in accord with the objective of the Zoning Ordinance, the purposes of the land use district in which it is located and is appropriate to the specific location;

2. is not detrimental to the health, safety, and general welfare of the City;

3. will not adversely affect the orderly development of property within the City;

4. will not adversely affect the preservation of property values and the protection of the tax base and other substantial revenue sources within the City;

5. is consistent with the objectives, policies, general land uses and programs specified in the General Plan and applicable specific plan;

6. will not create a nuisance or enforcement problem within the neighborhood;

7. will not encourage marginal development within the neighborhood;

8. will not create a demand for public services within the City beyond that of the ability of the City to meet in light of taxation and spending restraints imposed by law; and,

9. is consistent with the City's approved funding priorities.

Environmental: This proposal is categorically exempt from the requirements of the California Environmental Quality Act (CEQA) under Class 1, 'Existing Facilities' of the CEQA Guidelines, Section 15301, as the business would occupy an existing commercial tenant space with no expansion of the building footprint or change in intensity of land use.

Public Notice: On or prior to July 11, 2025, notice of the July 22, 2025, public hearing was posted at City Hall, near the proposed project site, and on the "Public Notices" section of the City's website; was delivered for posting at the Pittsburg Library; and was mailed via first class or electronic mail to the applicant, to the property owner, to owners of property located within 300 feet of the proposed project site, to local service agencies expected to provide services to the building, and to individuals who had previously filed written request for such notice, in accordance with PMC Section 18.14.010 and Government Code Section 65091.

See Attachment 5 for Public Hearing Notice.

ANALYSIS:

Staff believes that the required findings can be made to approve a Use Permit application. The proposed pet grooming business would provide a neighborhood-serving personal service use consistent with the intent of the Community Commercial land use designation and the zoning district's conditional use allowances. The location within a developed shopping center with existing infrastructure, access, and parking is appropriate for this type of service business.

Pursuant to PMC Section 18.78.040, Animal Grooming uses require one off-street parking space per 400 square feet of tenant space. For the proposed 1,464-square-foot business, four spaces are required. The shared parking lot serving Atlantic Plaza currently exceeds the minimum parking required for all tenants, and staff has determined that there is adequate capacity to serve the proposed use without negatively impacting parking availability for other tenants.

The proposed project involves no exterior alterations and would operate during normal business hours. The indoor nature of the grooming activity, combined with the limited number of pets held on-site at any time, will help mitigate potential noise or odor concerns. Conditions of approval are included within the proposed Resolution (Attachment 1) to address sanitation and noise control concerns, further ensuring the business does not negatively impact surrounding land uses.

ACTION REQUIRED:

Move to adopt a Resolution approving Planning Application No. 25-0060 (UP), subject to conditions.

ATTACHMENTS:

1. Proposed Resolution
2. Site Photos
3. Map of Surrounding Uses
4. Project Plans
5. Public Hearing Notice & Vicinity Map

Prepared by: Kelsey Gunter, AICP, Associate Planner

BEFORE THE PLANNING COMMISSION OF THE CITY OF PITTSBURG

In the Matter of:

Granting Approval of a Use Permit to	)	
to Establish an Animal Grooming Facility	)	Resolution No.
within an existing multi-tenant building	)	
located at 268 Atlantic Avenue, for	)	
"Atlantic Pet Groomers" AP-25-0060 (UP)	)	

The Planning Commission DOES RESOLVE as follows:

Section 1. Background

A. On June 25, 2025, Mariana de Lopez filed Planning Application No. 25-0060 requesting approval of a Use Permit to establish an "Animal Grooming" facility within a 1,464-square-foot tenant space at 268 Atlantic Avenue, located within the Atlantic Plaza Shopping Center in the Community Commercial (CC) Zoning District. Assessor's Parcel No. 088-121-028.

B. The proposed project is governed by the Pittsburg General Plan and Pittsburg Municipal Code (PMC).

C. In accordance with PMC Section 18.16.040, a Use Permit may be granted only if specific findings are made relating to zoning consistency, community impact, orderly development, and conformance with General Plan policies.

D. The proposed use conforms with the applicable "Community Commercial" General Plan designation and the applicable goals and policies of the City's General Plan and Zoning Code.

E. The project is categorically exempt from the California Environmental Quality Act (CEQA), pursuant to Section 15301 (Class 1, Existing Facilities) of the CEQA Guidelines.

F. On or prior to July 11, 2025, notice of the July 22, 2025, public hearing was posted at City Hall, near the proposed project site, and on the 'Public Notices' section of the City's website; was delivered for posting at the Pittsburg Library; and was mailed via first class or electronic mail to the applicant, to the property owner, to owners of property located within 300 feet of the proposed project site, to local service agencies expected to provide services to the building, and to individuals who had previously filed written request for such notice, in accordance with Pittsburg Municipal Code (PMC) Section 18.14.010 and Government Code Section 65091.

G. On July 22, 2025, the Planning Commission held a public hearing on Planning Application No. 25-0060, at which time oral and/or written testimony was considered.

Section 2. Findings

A. Based on the Planning Commission Staff Report entitled, “Consideration of a Resolution Granting approval of a Use Permit to Establish an Animal Grooming Facility at 268 Atlantic Avenue, AP-25-0060 (UP),” dated July 22, 2025, and based on all the information contained in the Planning Division files on the project, incorporated herein by reference and available for review in the Planning Division located at 65 Civic Avenue in Pittsburg, and based on all written and oral testimony presented at the meeting, the Planning Commission finds that:

1. All recitals above are true and correct and are incorporated herein by reference.

2. The Use Permit proposal will:

   a) Be in accordance with the objectives of the Zoning Ordinance, the purpose of the land use district in which it is located and is appropriate to the specific location, in that and the CC (Community Commercial) District, which allows for conditionally permitted personal service businesses such as Animal Grooming within multi-tenant centers.

   b) Not be detrimental to the health, safety, and general welfare of the City, if conditions of approval are adopted, including, but not limited to the following: 1) prohibiting overnight boarding; 2) requiring all grooming activities to be performed indoors; and 3) operations permitted only during normal business hours.

   c) Will not adversely affect the orderly development of property within the City, in that the Animal Grooming facility will occupy an existing, vacant, commercial space, and the applicant is not proposing exterior building expansions or parking lot changes that would otherwise conflict with the City’s goals, policies, and development standards.

   d) Not adversely affect the preservation of property values and the protection of the tax base and other substantial revenue sources within the City. Occupancy of a vacant space in an active retail center will contribute positively to local revenue and vitality.

   e) Will be consistent with the General Plan. The subject site has a land use designation of ‘Community Commercial’ which envisions a mix of commercial services in Community Commercial areas. Animal Grooming is similar in nature to other personal services typically found in such districts.

   f) Will not create a nuisance or enforcement problem within the neighborhood, in that it will be required to meet performance standards, as set forth by PMC Chapter 18.82, which are intended to address ongoing safety, noise, odor, and maintenance concerns. Further, animals will be kept in individual enclosures inside the building and will not remain on-site overnight.

   g) Will not encourage marginal development within the neighborhood, in that the Animal Grooming facility will occupy an existing commercial space and the Use Permit proposal does not involve construction of a new building or building

addition. The use will utilize an appropriately sized, existing tenant space with adequate facilities.

h) Will not create a demand for public services within the City beyond that of the ability of the City to meet in light of taxation and spending restraints imposed by law, in that the Animal Grooming facility has access to existing infrastructure, including fire, police, and water.

i) Will not be inconsistent with the City's approved funding priorities, in that it does not require City funding.

B. The staff report entitled, "Consideration of a Resolution Granting approval of a Use Permit to Establish an Animal Grooming Facility at 268 Atlantic Avenue, AP-25-0060 (UP)" dated July 22, 2025, is referenced hereto as additional support for the findings.

Section 3. Decision

Based on the findings set forth above, the Planning Commission hereby approves Planning Application No. 25-0060, subject to the following conditions:

City of Pittsburg Planning Division Conditions of Approval:

1. Business Operations: The business shall be operated substantially as described in the application materials and the July 22, 2025, Staff Report. Any substantial change in operations shall require review and approval by the Planning Division.

2. Business License: The business operator shall obtain and maintain a City of Pittsburg Business License and Business Permit for the entirety of all business operations.

3. Other Licensing: Business operator is responsible for obtaining and maintaining all required licensing from all external agencies, including but not limited to, Contra Costa County Environmental Health Department.

4. Hours of Operation: Business hours of operation are subject to change, but, in no case shall business operations extend beyond 10:00 P.M. or before 5:00 A.M.

5. Overnight Boarding Prohibited: The facility shall not provide any overnight boarding. Animals shall be accepted and returned on the same business day.

6. Animal Grooming: All animal grooming must be performed indoors.

7. Material Disposal: The applicant shall ensure all pet bathing and cleaning liquids are disposed of in accordance with municipal sanitary sewer regulations and shall not be discharged into exterior storm drains or catch basins.

8. Outdoor Cleaning: Floor mats or pet-related equipment shall not be washed outdoors. All outdoor cleaning shall utilize dry methods and shall not utilize any chemicals that may, as a result, be discharged into storm drains or catch basins.

9. Business Signage: Any proposed signage must be submitted for separate review and approval through a Sign Review Permit Application process and shall comply with all City sign standards as specified within PMC Title 19, and the Atlantic Plaza Master Sign Program.

10. Trash Receptacles: The business operator shall remove refuse from the Animal Grooming facility on a daily basis in order to maintain a clean and sanitary environment, prevent the accumulation of waste that could attract pests, and reduce the risk of odors. Trash pick-up service shall be regulated by Mount Diablo Resource Recovery.

11. Graffiti Removal: All graffiti shall be removed on any part of the property within 48 hours of its appearance.

Contra Costa County Fire Protection District Conditions of Approval:

12. Tenant Improvement Permit Required. The developer shall submit building construction plans and specifications for the subject project to the Fire District for review and approval. Plan submittal instructions are located at the end of this letter. After the tenant improvement plans are approved, plans and specifications for all deferred submittals shall be submitted, including, but not limited to the following:

    a. Fire sprinklers (if applicable)
    b. Fire alarm (if applicable)

    All projects shall be submitted to the Fire District for review and approval prior to construction of the building or installation of the systems to ensure compliance with minimum requirements related to fire and life safety. Plan review and inspection fees shall be submitted at the time of plan review submittal. (105.4.1) CFC, (901.2) CFC, (107) CBC

City of Pittsburg Building Division Conditions of Approval:

13. All new businesses must obtain both a City of Pittsburg Business License and a Certificate of Occupancy prior to commencing any business operations.

14. On the cover sheet of the plan set, clearly indicate the applicable building design codes. The City of Pittsburg enforces the following codes: - 2022 California Administrative Code (CAC); 2022 California Building Code (CBC); 2022 California Historical Building Code (CHBC); 2022 California Existing Building Code (CEBC); 2022 California Green Building Standards Code (CGBSC); 2022 California Mechanical Code (CMC); 2022 California Plumbing Code (CPC); 2022 California Electrical Code (CEC); 2022 California Energy Code (CEC Part 6); 2022 California Fire Code; Pittsburg Municipal Code; Reference CBC Section 107.

15. Verify that the Drawing Index listed on the cover sheet includes all plan sheets. Reference CBC Section 107.

16. On the cover sheet, provide a complete Code Analysis, including: - Proposed tenant use; Occupancy Group; Type of Construction; Separated or Nonseparated Mixed; Occupancies; Fire sprinkler status; Floor area (square footage); Number of stories; Occupant load; Reference CBC Sections 111, 302.1, 401, 503, 508, 601, 903, and 1004.1.

17. Plans and specifications for commercial buildings and tenant improvements must be prepared by a licensed architect or engineer, except for interior alterations involving only non-bearing partitions. Licensed professionals must affix their stamp on the plans to indicate responsibility. Licensed mechanical, plumbing, and electrical contractors may design systems they are installing.

18. The Site Plan must show all code-compliant accessible parking spaces, access aisles, and an accessible route to all entrances and exterior ground-floor exits. Accessibility design requirements include Sidewalk and path width: minimum 48 inches; Walking surface slope: max 1:20 (5%); Ramp slope: max 1:12 (8.3%); Cross slope: max 1:48 (2%); Curb ramp slope: max 1:12 (8.3%); Provide 36-inch-long detectable warning surfaces at vehicular crossing points

19. Provide at least one accessible route from accessible parking/loading zones, public sidewalks, and public transportation stops to the accessible building entrance. If multiple routes are provided, all must be accessible.

20. At least one accessible route shall connect all accessible buildings, facilities, elements, and spaces on the same site.

21. All exterior and interior accessibility features shall be designed and built to comply with Chapter 11B of the 2022 California Building Code.

22. The following outside agency clearances must be obtained and submitted prior to permit issuance, if applicable: Delta Diablo Sanitation District; Contra Costa Water District; Contra Costa County Fire Protection District; School District Fee Payment; Contra Costa Environmental Health Department (CCCEH); Bay Area Air Quality Management District (BAAQMD) (Notification and compliance for demolition, especially where asbestos or lead-based paint may be involved.)

23. Standard Conditions of Development: The Standard Conditions of Development as adopted by the Pittsburg Planning Commission by Resolution No. 8931 shall apply as conditions of approval for this project as applicable. Where there is a conflict between the Standard Conditions of Development and the project-specific conditions identified in this resolution, the specific conditions of this resolution shall govern.

24. Other Agency Requirements: The applicant shall comply with all the requirements of the City's Community and Economic Development Department, and all other applicable local, state and federal agencies. It is the responsibility of the applicant to contact each local, state, or federal agency for requirements that may pertain to this project.

25. Indemnification: Applicant agrees to indemnify, defend, and hold harmless the City, its officials, officers, employees, agents and consultants from any and all administrative, legal or equitable actions or other proceedings instituted by any person challenging the validity of this project approval, subsequent project approval, or other action arising out of, or in connection with, this project approval. The parties shall cooperate in defending such action or proceeding. The parties shall use reasonable efforts to select mutually agreeable defense counsel but, if the parties cannot reach agreement, City may select its own legal counsel at applicant's sole cost and expense. Applicant may select its own legal counsel to represent applicant's interests at applicant's sole cost and expense. Applicant shall pay for City's costs of defense, whether directly or by timely reimbursement to City on a monthly basis. Such costs shall include, but not be limited to, all court costs and attorneys' fees expended by City in defense of any such action or other proceeding, plus staff and City Attorney time spent responding to and defending the claim, action or proceeding.

26. Expiration of Approval: This use permit shall expire on July 22, 2027, unless the use has been legally established prior to the expiration date, or a written request for an extension is filed with the Planning Division prior to the expiration date and subsequently approved by the Planning Commission.

Section 4. Effective Date

This resolution shall take effect immediately upon its adoption.

On motion by Commissioner_____, seconded by Commissioner _____, the foregoing resolution was passed and adopted the 22nd day of July 2025, by the Planning Commission of the City of Pittsburg, California by the following vote:

AYES:

NAYES:

ABSTAIN:

ABSENT:

I hereby certify that the above Resolution No. _____ was adopted by the Planning Commission of the City of Pittsburg on July 22, 2025.

_____
JOHN FUNDERBURG, SECRETARY
PITTSBURG PLANNING COMMISSION

AP-25-0060 (UP)
Atlantic Pet Groomers
Attachment 2 Project Site Photos



AP-25-0060 (UP)
Atlantic Pet Groomers
Attachment 2 Project Site Photos



AP-25-0060 (UP)
Atlantic Pet Groomers
Attachment 3 Surrounding Land Uses



AP-25-0060 (UP)
Atlantic Pet Groomers
Attachment 4 Project Plans



electrical panel

emergency exit

Sink

toilet

existing bathroom
employees only

Dog Washing Room

(N) Tub

(N) tub = can wash 2 dogs at a time

Door 36"

walkway

office/admin space for dog grooming business

Also staff break room.

dog crate area. Max. 8 dogs at any time.

hallway

Door 36"

window

Door 71 5/8"

Dog hair cutting location (two tables)

Check-in Counter (N)

Customer waiting area

front door 36"

2608 Atlantic Avenue, Pittsburg

(Not to scale)

65 Civic Avenue
Pittsburg, CA 94565
P: (925) 252-6900
F: (925) 252-4814

pittsburgca.gov

Community and Economic Development Department – Planning Division

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the **PLANNING COMMISSION** of the City of Pittsburg will conduct a public hearing on:

DATE: **July 22, 2025**
TIME: **7:00 P.M.**
PLACE: **City Council Chamber at City Hall**
65 Civic Avenue, Pittsburg, California

Concerning the following matter:

Atlantic Pet Groomers, AP-25-0060 (UP)
This is a public hearing on a request for approval of a Use Permit to establish an Animal Grooming facility within the multitenant space located at 268 Atlantic Avenue, in the CC (Community Commercial) Zoning District. Assessor's Parcel No. 088-121-028.

Environmental Determination
The proposed project is categorically exempt from the provisions of the CEQA Guidelines under Class 1, 'Existing Facilities' of the CEQA Guidelines, Section 15301, as the business would occupy an existing commercial tenant space with no expansion of the building footprint or change in intensity of land use.

PROJECT PLANNER: Kelsey Gunter, (925) 252-4824 or kgunter@pittsburgca.gov

Why am I receiving this notice?
You are receiving this notice because you have either previously requested notifications from the Planning Division, or a project has been proposed in your neighborhood and all property owners within a minimum 300-foot radius of the project site are required to be notified under the Pittsburg Municipal Code.

Where can I get more information about this project? What can I do if I have comments on the project?
The complete file for this project is available for public inspection; please contact the project planner listed above to make necessary arrangements. Comments or objections to the project can be made by writing or through e-mailed testimony prior to the meeting or provided orally during the meeting. Written comments citing the project name may be emailed to the project planner listed above or may be mailed or delivered to Pittsburg Planning Division, 65 Civic Avenue, Pittsburg, CA 94565. Pursuant to Section 65009 of the California Government Code, if you challenge this matter in court, you may be limited to those issues you or someone else raised at the public hearing described in this notice, or in written correspondence on the matter delivered to this agency at, or prior to the public hearing. Any written correspondence delivered to the Planning Division before the hearing body's action on the matter will become a part of the administrative record.

Para información en español:
(925) 252-4920

JOHN FUNDERBURG, SECRETARY
PITTSBURG PLANNING COMMISSION

Project Title: Atlantic Pet Groomers; AP-25-0060
Location: 268 Atlantic Avenue, Pittsburg, CA 94565



City of Pittsburg
Community and Economic Development Department - Planning Division
65 Civic Avenue
Pittsburg, CA 94565

NOTICE OF PUBLIC HEARING

CITY OF PITTSBURG
PLANNING COMMISSION
STAFF REPORT
July 22, 2025

ITEM: Consideration of a Resolution Granting approval of a Use Permit to include ancillary sales of distilled spirits in conjunction with an existing beer and wine sales license for an existing ARCO and AM/PM convenience store, AP-23-0062 (UP).

ORIGINATED BY:

Steve Rawlings, 2102 West Leland Road, Pittsburg, CA 94565

SUBJECT:

This is a public hearing on a request for approval of a Use Permit to allow for the sale of distilled spirits in conjunction with the sale of beer and wine, at an existing convenience store. The convenience store is located at 2102 West Leland Road, in the CS (Service Commercial) District. Assessor's Parcel No. 091-050-038.

RECOMMENDATION:

Staff recommends the Planning Commission adopt a Resolution (Attachment 1) approving Use Permit Application No. AP-23-0062 (UP), subject to conditions.

BACKGROUND:

On July 19, 2010, the City Council adopted Ordinance No. 10-1326 amending the Southwest (San Marco) Development Agreement and rezoning the 1.4-acre project site to CS to allow for the development of the San Marco Gas Station (AP-09-588).

On May 10, 2021, the State Department of Alcoholic Beverage Control (ABC) approved a Type 20 license for the existing convenience store (AM/PM). A Type 20 ABC license authorized the sale of beer and wine at the convenience store for consumption off premises.

On April 26, 2023, the applicant filed Planning Application No. 23-0062 requesting to expand the alcoholic beverage sales at the existing convenience store from beer and wine, to beer, wine, and distilled spirits. The expansion constitutes an ABC license change from a Type 20 to a Type 21. A Type 21 ABC license would authorize the sale of beer, wine, and distilled spirits for consumption off the premises. Pursuant to Pittsburg Municipal Code (PMC) Section 18.52.010, the applicant must obtain a Use Permit prior to allowing sales of distilled spirits, in addition to beer and wine sales, at the convenience store and prior to ABC's approval of the Type 21 license.

On July 11, 2023, this item was listed on the regularly scheduled Planning Commission agenda as Item Number 5. The Planning Commission Secretary requested a

continuance of this item to a date to be determined. The Planning Commission granted the requested continuance.

On June 2, 2025, the City Council adopted two Ordinances for Creating Healthy Communities, one of which establishes Use Permit findings and performance standards for alcoholic beverage establishments. The Creating Healthy Communities Ordinances take effect on January 1, 2026. The proposed application AP-23-0062 has been reviewed for compliance with the recently adopted Ordinance, and complies with, or has been conditioned to comply with, the standards and regulations described therein. Further evaluation of Creating Healthy Community Ordinance (Ord. No. 25-1531) compliance is included within the "Analysis" section of this Staff Report.

PROJECT DESCRIPTION:

Existing Conditions: The subject site is a 1.41-acre parcel located at the northwest corner of San Marco Boulevard and West Leland Road. It contains an approximately 6,000-square-foot (sq. ft.) convenience store (AM/PM), a self-service restaurant (Krispy Krunchy Chicken), an ARCO gas station with eight fueling pumps, an automatic car wash, a trash enclosure and a parking lot. See Attachment 2 for site photos.

Surrounding Land Uses:

North:	San Marco Villas Apartments (Phases I and II)
West:	San Marco Villas Apartments (Phases I and II)
South:	W Leland Road, Vacant Land
East:	San Marco Boulevard, Toscana Residential Subdivision (Village A), Shoppes at San Marco

See Attachment 3 for a map of surrounding uses.

Use Permit Request: The applicant is requesting Planning Commission approval of a Use Permit to allow the existing convenience store to sell distilled spirits for consumption off the premises as an ancillary use. The sale of the distilled spirits would be in conjunction with the already approved existing beer and wine sales. The existing convenience store layout includes a cashier's counter along the rear wall and refrigerated display cases for the display of beverages. The open space floor area within the convenience store provides shelves for groceries and convenience items. A restroom is located in the southeast corner of the tenant space.

The applicant would like to install wall shelves behind the cashier's counter for display of the distilled spirits. No additional interior or exterior improvements are proposed at this time.

See Attachment 4 for site and floor plan.

GENERAL PLAN/CODE COMPLIANCE:

General Plan: The project site is located in the 'Southwest Hills Subarea' of the General Plan and has a land use designation of 'Community Commercial'. This designation is intended to provide sites for retail shopping containing a wide variety of businesses, including service stations, such as the existing convenience store.

Zoning: The project site is within the 'CS (Service Commercial) Zoning District'. Convenience stores fall under the land use classification of 'Grocery' as defined by PMC Section 18.08.080(14)(a). A Use Permit is required prior to operating a grocery or convenience store in the CS District (PMC Section 18.52.010). The applicant's convenience store is an existing, approved use and therefore does not require a new Use Permit to continue operating with the sale of beer and wine. However, a Use Permit is now required because the applicant is expanding the existing operation to include the sale of distilled spirits for consumption off premises.

Required Use Permit Findings: In accordance with PMC Section 18.16.040, a Use Permit may be granted only if the Planning Commission can make findings that the proposed use:

1. is in accord with the objective of the Zoning Ordinance, the purposes of the land use district in which it is located and is appropriate to the specific location;

2. is not detrimental to the health, safety, and general welfare of the City;

3. will not adversely affect the orderly development of property within the City;

4. will not adversely affect the preservation of property values and the protection of the tax base and other substantial revenue sources within the City;

5. is consistent with the objectives, policies, general land uses and programs specified in the General Plan and applicable specific plan;

6. will not create a nuisance or enforcement problem within the neighborhood;

7. will not encourage marginal development within the neighborhood;

8. will not create a demand for public services within the City beyond that of the ability of the City to meet in light of taxation and spending restraints imposed by law; and,

9. is consistent with the City's approved funding priorities.

Environmental: This proposal is categorically exempt from the requirements of the California Environmental Quality Act (CEQA) under Class 1, 'Existing Facilities' of the CEQA Guidelines, Section 15301.

Public Notice: On or prior to July 11, 2025, notice of the July 22, 2025, public hearing was posted at City Hall, near the proposed project site, and on the "Public Notices" section of the City's website; was delivered for posting at the Pittsburg Library; and was mailed via first class or electronic mail to the applicant, to the property owner, to owners of property located within 300 feet of the proposed project site, to local service agencies expected to provide services to the building, and to individuals who had previously filed written request for such notice, in accordance with PMC Section 18.14.010 and Government Code Section 65091.

See Attachment 5 for Public Hearing Notice.

Public Comment: On May 25, 2023, in response to the referral that was circulated for the project, the City received an email in opposition to the project from Veronica Maya with the Pittsburg-Bay Point Community Coalition. The coalition is comprised of local community residents concerned with the access underage youth have to alcohol, cannabis, tobacco, and other drugs. Maya indicated the project site is located nearby family housing units, a community park and four schools within a two-mile radius. Maya also indicated distilled spirits are actively marketed by the alcohol industry to teenagers and are packaged in a similar fashion to non-alcoholic drinks with sweet flavors and fun names. Maya indicated that distilled spirits pose an unaddressed risk factor for underage drinking and for these reasons opposes this project.

On July 10, 2025, in response to the Public Hearing Notice that was circulated for the project, the City received an email in opposition to the project from Eric and Jeneal Valladares, members of the Pittsburg community. The email in opposition discussed the project site's proximity to residential uses and youth-oriented facilities, such as schools and parks. The email also mentions that nuisances often are generated from hard liquor sales in convenience stores, and that convenience stores are often not staffed to manage distilled spirits in a way that would not strain local law enforcement and other public services.

Staff has reviewed these public comments. See Analysis Section of this Staff Report for detailed discussion.

Staff has not received any additional letters or comments in support or opposition to the proposed project.

See Attachment 6 for Pittsburg-Bay Point Community Coalition Comment Letter and Attachment 7 for the email from Eric and Jeneal Valladares.

ANALYSIS:

In California, ABC uses census tracts to allocate alcoholic beverage licenses, ensuring a balanced distribution based on population density within specific geographical areas. The proposed project is located within Census Tract 3552.02, which is allowed a maximum of two Off-Sale General ABC licenses. Currently, the only Off-Sale General

ABC license issued within the Census Tract is the subject site. The existing convenience store currently holds a Type 20 ABC license, which would be replaced by the Type 21 license if the proposed project is approved, thereby resulting in only one Off-Sale General ABC license within the census tract. ABC would allow a Type 21 license to be issued at this location if approved by the Planning Commission, given that there is not an overconcentration of ABC licenses currently in the census tract.

The applicant's request to upgrade from a Type 20 to a Type 21 ABC license aligns with the recently adopted Creating Healthy Communities Ordinance No. 25-1531, which regulates the sale of distilled spirits in retail establishments through performance standards. The Ordinance establishes clear criteria for location, security, signage, and operations, all of which the proposed project satisfies. The store exceeds the 600-foot buffer from sensitive uses such as schools, parks, and treatment centers, as verified through GIS mapping. Additionally, the proposed floor plan includes secured, behind-the-counter display of distilled spirits and maintains compliance with signage restrictions, ensuring no more than 25% of window space is covered. Existing exterior lighting and surveillance systems meet the Ordinance's safety and nuisance prevention requirements, with no history of alcohol-related incidents or law enforcement concerns in the area.

Operationally, the business demonstrates a strong commitment to responsible alcohol sales. All employees will complete the License Education on Alcohol and Drugs (LEAD) Program, in compliance with both state law and the Ordinance's provisions for staff education and accountability. Moreover, the proposal supports local economic activity within the project area, without compromising public welfare.

In particular, staff recommends a conditions prohibiting the sale of: 1) wine in containers less than 750 milliliters; 2) distilled spirits in containers less than 375 milliliters; 3) malt beverage products, including flavored malt beverage products, with alcohol content greater than 5.5% by volume; 4) wine with an alcoholic content greater than 14% by volume unless in corked bottles and aged at least two years; 5) single containers of beer or malt liquor greater than 25 ounces; and 6) alcohol-infused ice cream or ice pops with alcohol greater than 0.5 percent by volume. According to the Pittsburg Police Department, the sale of these products tends to negatively affect a neighborhood. The applicant understands this and has agreed to this condition.

The applicant has also agreed to other conditions including: 1) prohibiting the possession and consumption of alcoholic beverages in open containers on or around the premises; 2) limiting the sales hours for alcoholic beverages to the hours of 8:00 a.m. to.10:00 p.m., daily; 3) locking coolers containing alcohol from 10:01 p.m. to 7:59 a.m. daily; 4) requiring sales clerks to complete a course in LEAD (License Education on Alcohol and Drugs) program approved by ABC; 5) limiting the new display area for distilled spirits to 32 linear feet of shelving; 6) requiring unobstructed view of the cash register area from the street; 7) requiring installation of security cameras; 8) requiring the convenience store operators to help discourage loitering; 9) prohibiting the sale of drug paraphernalia; 10) requiring the operators to remove trash outside the

convenience store on a daily basis; and 11) requiring all graffiti to be removed within 48 hours of its appearance.

Staff has reviewed the comments submitted by the Pittsburg-Bay Point Community Coalition regarding concerns about underage access to alcohol, the marketing of distilled spirits, and the proximity of the project site to residential units, schools, and a community park. The proposed expanded alcoholic beverage sales operation will be subject to all applicable local and state regulations regarding the sale of alcohol, including strict age-verification procedures. In addition, specific Conditions of Approval have been incorporated into the project to address community concerns. These include prohibiting on-site consumption of alcohol, limiting time of alcoholic beverage sales, locking beverage containers during prohibited sales hours, and implementing measures to prevent loitering on and around the premises. Enhanced surveillance and operational oversight are expected to deter nuisance behavior and contribute to overall public safety. It should also be noted that, under the recently adopted Creating Healthy Communities Ordinances, residential uses are not classified as sensitive land uses. Further, the schools and parks identified by the Coalition are outside of the required buffer zones. Based on the project's regulatory compliance and proposed Conditions of Approval, staff finds that the proposed expansion of alcoholic beverage sales is not anticipated to negatively impact the surrounding neighborhood.

Staff has reviewed the comment submitted by a San Marco resident opposing the sale of distilled spirits as part of the proposed project, citing concerns about public safety, neighborhood character, and proximity to homes, schools, and parks. The proposed use is consistent with local and state regulations, including requirements from the California Department of Alcoholic Beverage Control (ABC). Conditions of Approval have been incorporated to address community concerns, including restrictions on sales hours, locked alcohol displays during prohibited times, prohibition of on-site consumption, anti-loitering measures, and enhanced security features. The site is outside required buffer zones as prescribed by the Pittsburg Municipal Code. With the inclusion of the proposed Conditions of Approval, staff does not anticipate that the project will result in adverse impacts to the surrounding neighborhood.

Additionally, staff has reviewed the application and finds the project to be compliant with the recently-adopted Creating Healthy Communities Ordinance No. 25-1531, with appropriate safeguards and compatibility with the surrounding area. As such, staff recommends approval of the Use Permit to allow the expanded sale of distilled spirits under a Type 21 ABC license subject to the Conditions of Approval outlined in the proposed Resolution.

As such, staff believes the Planning Commission can make the required findings in the affirmative to approve the requested Use Permit for AM/PM at 2102 West Leland Road if certain Conditions of Approval are set in place to help maintain public health and safety in the neighborhood. These Conditions of Approval are similar to those that have been placed on previously-approved businesses that include the sale of beer, wine and distilled spirits.

ACTION REQUIRED:

Move to adopt a Resolution approving Planning Application No. 23-0062 (UP), subject to conditions.

ATTACHMENTS:

1. Proposed Resolution
2. Site Photos
3. Map of Surrounding Uses
4. Project Plans
5. Public Hearing Notice & Vicinity Map
6. Pittsburg-Bay Point Community Coalition Letter
7. Public Comment from E. and J. Valladares

Prepared by: Kelsey Gunter, AICP, Associate Planner

BEFORE THE PLANNING COMMISSION OF THE CITY OF PITTSBURG

In the Matter of:

Granting approval of a Use Permit to allow ancillary sales of distilled spirits in conjunction with an existing beer and wine sales license for an existing ARCO and AM/PM convenience store at 2102 West Leland Road, AP-23-0062 (UP).	)	Resolution No.

The Planning Commission DOES RESOLVE as follows:

Section 1. Background

A. On July 19, 2010, the City Council adopted Ordinance No. 10-1326 amending the Southwest (San Marco) Development Agreement and rezoning the 1.4-acre project site located at 2102 West Leland Road to the "Service Commercial" (CS) District to allow for the San Marco Gas Station (AP-09-588).

B. On May 10, 2021, the California State Department of Alcoholic Beverage Control (ABC) approved a Type 20 License for the existing convenience store (AM/PM) authorizing the sale of beer and wine at the convenience store for consumption off the premises.

C. On April 26, 2023, Steve Rawlings, filed Planning Application No. 23-0062, requesting approval of a use permit to sell beer, wine, and distilled spirits (for off-site consumption) at an existing convenience store that currently sells beer and wine (for off-site consumption). The convenience store is located at 2102 West Leland Road, in the CS (Service Commercial) District. Assessor's Parcel No. 091-050-038.

D. On July 11, 2023, this item was listed on the regularly scheduled Planning Commission agenda as Item Number 5. The Planning Commission Secretary requested a continuance of this item to a date to be determined. The Planning Commission granted the requested continuance.

E. The use permit proposal is governed by the Pittsburg General Plan and Pittsburg Municipal Code (PMC).

F. This proposal is categorically exempt from the requirements of the California Environmental Quality Act (CEQA) under Class 1, 'Existing Facilities' of the state CEQA Guidelines, section 15301.

G. On or prior to July 11, 2025, notice of the July 22, 2025, public hearing was posted at City Hall, near the proposed project site, and on the 'Public Notices' section of the City's website; was delivered for posting at the Pittsburg Library; and was mailed via first class or electronic mail to the applicant, to the property owner, to owners of property located within 300 feet of the proposed project site, to local service agencies expected to provide services to the building, and to individuals who had previously filed written request for

such notice, in accordance with Pittsburg Municipal Code (PMC) Section 18.14.010 and Government Code Section 65091.

H. On June 2, 2025, the City Council adopted two Ordinances for Creating Healthy Communities in the City of Pittsburg, one of which establishes Use Permit findings and performance standards for the sale and distribution of alcoholic beverages. The proposed application AP-23-0062 has been reviewed for compliance with the recently adopted Ordinance.

I. On July 22, 2025, the Planning Commission held a public hearing on Planning Application No. 23-0062, at which time oral and/or written testimony was considered.

Section 2. Findings

A. Based on the Planning Commission Staff Report entitled, "Consideration of a Resolution Granting approval of a Use Permit to include ancillary sales of distilled spirits in conjunction with an existing beer and wine sales license for an existing ARCO and AM/PM convenience store, AP-23-0062 (UP)," dated July 22, 2025, and based on all the information contained in the Planning Division files on the project, incorporated herein by reference and available for review in the Planning Division located at 65 Civic Avenue in Pittsburg, and based on all written and oral testimony presented at the meeting, the Planning Commission finds that:

1. All recitals above are true and correct and are incorporated herein by reference.

2. The use permit proposal will:

a) Be in accordance with the objectives of the Zoning Ordinance, the purpose of the land use district in which it is located and is appropriate to the specific location, in that convenience stores with alcoholic beverage sales are conditionally permitted uses in the CS District.

b) Not be detrimental to the health, safety, and general welfare of the City, if conditions of approval are adopted, including, but not limited to the following: 1) prohibiting the possession and consumption of alcoholic beverages in open containers on or around the premises; 2) limiting the sales hours for alcoholic beverages to 8:00 a.m. to 10:00 p.m.; 3) locking coolers containing alcohol from 10:01 p.m. to 7:59 a.m.; 4) requiring sales clerks to complete a course in "License Education on Alcohol and Drugs (LEAD) Program" approved by the State Department of Alcoholic Beverage Control (ABC); 5) prohibiting the sale of certain alcoholic beverages including distilled spirits in containers less than 375 milliliters; 6) limiting the display area for distilled spirits; 7) requiring unobstructed view of the cash register area from the street; 8) requiring installation of security cameras; 9) requiring the convenience store operators to help discourage loitering; 10) prohibiting the sale of drug paraphernalia; 11) requiring the operators to remove trash outside the convenience store on a daily basis; and 12) requiring all graffiti to be removed within 48 hours of its appearance.

c) Will not adversely affect the orderly development of property within the City, in that the convenience store will continue occupying an existing commercial space, and the applicant is not proposing exterior building expansions or parking lot changes that would otherwise conflict with the City's goals, policies, and development standards.

d) Not adversely affect the preservation of property values and the protection of the tax base and other substantial revenue sources within the City, if the convenience store operator complies with the conditions of approval summarized above. The conditions of approval are intended to ensure the convenience store operates in a manner that does not affect neighborhood safety.

e) Will be consistent with the General Plan. The subject site has a land use designation of 'Community Commercial'. This designation is intended to provide sites for retail shopping containing a wide variety of businesses, including convenience stores.

f) Will not create a nuisance or enforcement problem within the neighborhood, in that it will be required to meet performance standards, as set forth by PMC Chapter 18.82, which are intended to address ongoing safety, noise, odor, and maintenance concerns.

g) Will not encourage marginal development within the neighborhood, in that the convenience store will continue occupying an existing commercial space and the use permit proposal does not involve construction of a new building or building addition.

h) Will not create a demand for public services within the City beyond that of the ability of the City to meet in light of taxation and spending restraints imposed by law, in that the convenience store has access to existing infrastructure, including fire, police, and water.

i) Will not be inconsistent with the City's approved funding priorities, in that it does not require City funding.

B. The staff report entitled, "Consideration of a Resolution Granting approval of a Use Permit to include ancillary sales of distilled spirits in conjunction with an existing beer and wine sales license for an existing ARCO and AM/PM convenience store, AP-23-0062 (UP)" dated July 22, 2025, is referenced hereto as additional support for the findings.

Section 3. Decision

Based on the findings set forth above, the Planning Commission hereby approves Planning Application No. 23-0068, subject to the following conditions:

1. ABC Approval: The business operator shall obtain California Department of Alcoholic Beverage Control (ABC) approval of an off sale general (Type 21) license prior to the sale of any distilled spirts.

2. Compliance with Creating Healthy Communities Ordinance No. 25-1531: Business operator must follow all Alcoholic Beverage Performance Standards as provided within PMC Section 18.84.1025.

3. Possession and Consumption: The possession of alcoholic beverages in open containers and the consumption of alcoholic beverages are prohibited on or around the premises.

4. Sales Hours: Alcoholic beverage sales shall not occur between the hours of 10:00 p.m. a.m. and 8:00 a.m.

5. Employee Training: All sales clerks shall complete an ABC approved course in "License Education on Alcohol and Drugs (LEAD) Program" within 90 days of the beginning of employment. Existing employees shall complete the LEAD Program within 90 days of this Resolution's effective date. Evidence of the employee's completion of this training shall be provided to the Pittsburg Police Department or Community and Economic Development Department upon request.

6. Prohibited Products: The sale of the following products shall be prohibited:

    a. Wine in containers less than 750 milliliters.

    b. Distilled spirits in containers less than 375 milliliters.

    c. Malt beverage products, including flavored malt beverage products, with alcohol content greater than 5.5% by volume. A 'flavored malt beverage' product is a malt beverage product to which is added an alcoholic or other flavoring ingredient and is labeled or packaged in a manner that is similar to labeling or packaging used for non-alcoholic beverages such as sodas, teas, lemonades, fruit punches, energy drinks, and slushes. Youth-oriented flavored malt beverage products are sold in bright, colorful packaging and are commonly known as 'alcopops'.

    d. Wine with an alcoholic content greater than 14% by volume unless in corked bottles and aged at least two years.

    e. Single containers of beer or malt liquor greater than 25 ounces.

    f. Alcohol-infused ice cream or ice pops with alcohol greater than 0.5 percent by volume.

7. Distilled Spirits Display Area: At no time shall there be more than 32 linear feet of shelving within the convenience store sales area that is devoted to the sale and/or display of distilled spirits.

8. Cups: The sale or distribution to the customer of paper or plastic cups in quantities less than their usual and customary packaging is prohibited.

9. Cash Register Visibility: Windows shall allow for unobstructed interior view of the cash register area from the street.

10. Advertising: Signage advertising the availability of alcohol for purchase from the store, including display of corporate logos of alcohol vendors, shall not be posted so as to be visible to any individual positioned outside of the store. All signage must obtain appropriate permits and comply with Title 19 for sign regulations.

11. Signage: The following signs shall be placed in a prominent location near the main entrance of the building in English, Spanish, and the predominant language of patrons. The signs shall be at least one square foot in size, or larger as necessary to ensure that the text of the sign is legible at a minimum distance of five feet.

    a. “California State Law prohibits the sale of alcoholic beverages to persons under 21 years of age”;

    b. “No Loitering or Public Drinking”; and

    c. “It is illegal to possess an open container of alcohol in the vicinity of this establishment”.

12. Security Cameras: The applicant shall install security cameras around the site and shall cooperate with the Pittsburg Police Department to: a) install the cameras on-site and in the building in a quantity and at locations that optimize the safety of customers and employees on the property; and b) ensure that the Pittsburg Police Department establishes and is provided continuous access to live and recorded feed from the security cameras installed on-site.

13. Loitering: The establishment’s operators shall discourage loiterers and ask persons loitering longer than 15 minutes to leave the area and contact Pittsburg Police for enforcement of applicable trespassing and loitering laws if the persons requested to leave fail to do so.

14. Additional Security Measures: The business operator shall be responsible for maintaining the peace and order on the premises. All necessary steps shall be taken to ensure that the customers refrain from incidents of violence and/or intoxication that adversely impact the safety of the community. Should the business experience loitering, noise, public disturbances or incidents of violence, and in the event that the business necessitates an increased police presence, the Chief of Police may require the business operator to provide additional public safety measures, including but not limited to, video cameras, additional exterior lighting, hiring licensed and bonded security guards approved by the Police Department, or such other measures as determined necessary by the Chief of Police. Any such required additional measures shall be at the business operator’s sole expense.

15. License Transfer: In accordance with California Business and Professions Code subsection 23800(E), and upon application for transfer of ownership of the ABC license, the Pittsburg Police Department shall reserve the right to amend the conditions of the ABC license.

16. Drug Paraphernalia: The sale of drug paraphernalia products as defined in Health and Safety Code sections 11014.5 and 11364.5 shall be prohibited. “Drug paraphernalia” means all equipment, products and materials of any kind that are used, intended for use, or designed for use, in planting, propagating, cultivating, growing, harvesting, manufacturing, compounding, converting, producing, processing, preparing, testing, analyzing, packaging, repackaging, storing, containing, concealing, injecting, ingesting, inhaling, or otherwise introducing into the human body a controlled substance in violation of the California Uniform Controlled Substances Act (commencing with California Health and Safety Code 11000).

17. Trash Receptacles: Trash receptacles shall be located at convenient locations outside the establishment, and operators of the business shall remove trash on a daily basis. Track pick-up service shall be regulated by Mount Diablo Resource Recovery. Additional pick-up days may be required as deemed appropriate by the Zoning Administrator.

18. Graffiti Removal: All graffiti shall be removed on any part of the property within 48 hours of its appearance.

19. Standard Conditions of Development: The Standard Conditions of Development as adopted by the Pittsburg Planning Commission by Resolution No. 8931 shall apply as conditions of approval for this project as applicable. Where there is a conflict between the Standard Conditions of Development and the project-specific conditions identified in this resolution, the specific conditions of this resolution shall govern.

20. Other Agency Requirements: The applicant shall comply with all the requirements of the City’s Community and Economic Development Department, California Department of Alcoholic Beverage Control, and all other applicable local, state and federal agencies. It is the responsibility of the applicant to contact each local, state, or federal agency for requirements that may pertain to this project.

21. Indemnification: Applicant agrees to indemnify, defend, and hold harmless the City, its officials, officers, employees, agents and consultants from any and all administrative, legal or equitable actions or other proceedings instituted by any person challenging the validity of this project approval, subsequent project approval, or other action arising out of, or in connection with, this project approval. The parties shall cooperate in defending such action or proceeding. The parties shall use reasonable efforts to select mutually agreeable defense counsel but, if the parties cannot reach agreement, City may select its own legal counsel at applicant’s sole cost and expense. Applicant may select its own legal counsel to represent applicant’s interests at applicant’s sole cost and expense. Applicant shall pay for City's costs of defense, whether directly or by timely reimbursement to City on a monthly basis. Such costs shall include, but not be limited to, all court costs and attorneys' fees expended by City in defense of any such action or other proceeding, plus staff and City Attorney time spent responding to and defending the claim, action or proceeding.

22. Expiration of Approval: This use permit shall expire on July 22, 2027, unless the use has been legally established prior to the expiration date, or a written request for an extension is filed with the Planning Division prior to the expiration date and subsequently approved by the Planning Commission.

Section 4. Effective Date

This resolution shall take effect immediately upon its adoption.

On motion by Commissioner_____, seconded by Commissioner _____, the foregoing resolution was passed and adopted the 22nd day of July 2025, by the Planning Commission of the City of Pittsburg, California by the following vote:

AYES:

NAYES:

ABSTAIN:

ABSENT:

I hereby certify that the above Resolution No. _____ was adopted by the Planning Commission of the City of Pittsburg on July 22, 2025.

_____
JOHN FUNDERBURG, SECRETARY
PITTSBURG PLANNING COMMISSION

Attachment 2
Existing Site Photos

AM/PM Alcohol Sales, AP-23-0068 (UP)



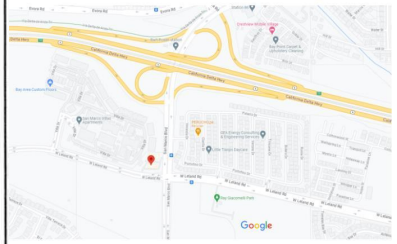


Attachment 3
Map of Surrounding Land Uses

AM/PM – Alcohol Sales, AP-23-0062 (UP)



Attachment 4



VICINITY MAP

SAN MARCOS VILLAGE APARTMENTS

SAN MARCOS VILLAGE APARTMENTS

AM/PM
3,800 SF

1,200 SF
QSR

CARWASH

CANOPY

SAN MARCO BLVD.

WEST LELAND ROAD

SITE DATA

LOT AREA	91,816 S.F.
AM/PM	3,800 S.F.
QSR	1,200 S.F
CANOPY	5,000 S.F.
CAR WASH	1,076 S.F.

PARKING 19 SPACES (1 ADA)

NO NEW CONSTRUCTION.
ALL IMPROVEMENTS ARE EXISTING

N
NORTH

SCALE: 1"=20'-0"

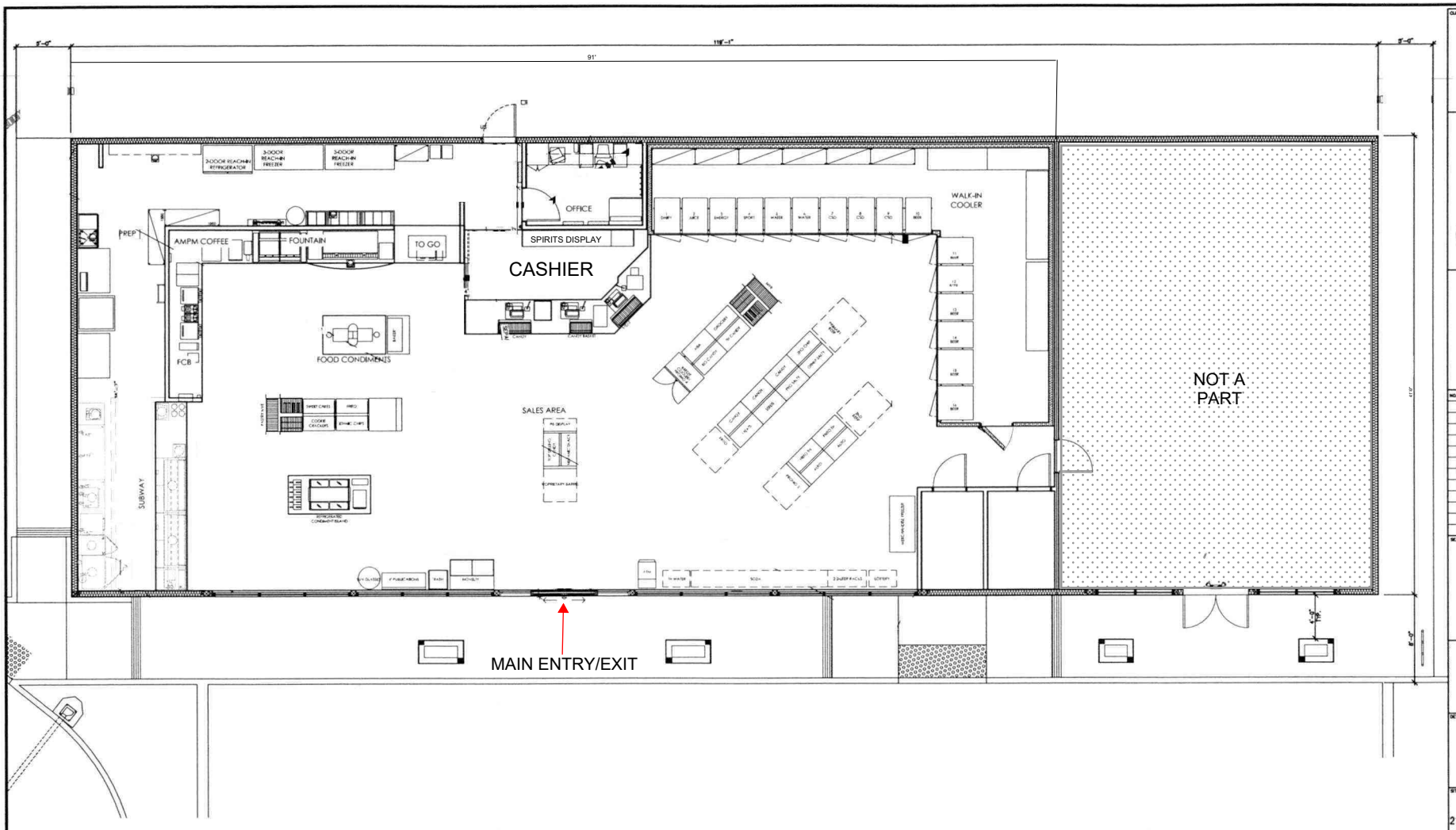
ARCO

SITE ADDRESS
2101 W. LELAND
PITTSBURGH, CA

APN
091-050-038-8

EXISTING
SITE PLAN

SP1



1 FLOOR PLAN
N.T.S

N
NORTH

PROPOSED USE:
FINDING OF PUBLIC CONVENIENCE OR NECESSITY AND PERMIT TO SELL BEER, WINE, AND DISTILLED SPIRITS FOR OFF-SITE CONSUMPTION (ABC TYPE 21 LICENSE) AT AN EXISTING CONVENIENCE STORE THAT CURRENTLY SELLS BEER AND WINE. NO NEW CONSTRUCTION PROPOSED.

CLIENT:
ARCO
BP WEST COAST PRODUCTS, LLC

Stantec

NO.	DATE	REVISION DESCRIPTION

SEAL:

DEVELOPMENT INFORMATION:

SITE ADDRESS:
2101 WEST LELAND RD.
PITTSBURG, CA 94656

DESIGNED BY: GMS	ALLIANCE ZONE:
CHECKED BY: GMS	BP REPN:
DRAWN BY: RM /DEV	ALLIANCE PM:
VERSION:	PROJECT NO: 2007814019

DRAWING TITLE:
FLOOR PLAN

SHEET NO:
A0.1

City of Pittsburg
Community and Economic Development Department – Planning Division
65 Civic Avenue, Pittsburg, CA 94565 | Tel: (925) 252-4920 | Fax: (925) 252-4814

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the **PLANNING COMMISSION** of the City of Pittsburg will conduct a public hearing on:

DATE: **July 22, 2025**
TIME: **7:00 p.m.**
PLACE: **City Council Chamber at City Hall**
65 Civic Avenue, Pittsburg, California

Concerning the following matter:

AM/PM – Alcohol Sales, AP-23-0062 (UP)
This is a public hearing on a request for approval of a Use Permit to allow the sales of beer, wine, and distilled spirits, at an existing convenience store that currently sells beer and wine. The convenience store is located at 2102 W Leland Road, in the CS (Service Commercial) District. Assessor's Parcel No. 091-050-038.

Environmental Determination
The project is categorically exempt from the requirements of the California Environmental Quality Act (CEQA) under Class 1, "Existing Facilities," of the CEQA Guidelines, section 15301.

PROJECT PLANNER: Kelsey Gunter, (925) 252-4824 or kgunter@pittsburgca.gov

---

Why am I receiving this notice?
You are receiving this notice because you have either previously requested notifications from the Planning Division, or a project has been proposed in your neighborhood and all property owners within a minimum 300-foot radius of the project site are required to be notified under the Pittsburg Municipal Code.

Where can I get more information about this project?
The complete file for this project is available for public inspection; please contact the project planner listed above to make necessary arrangements.

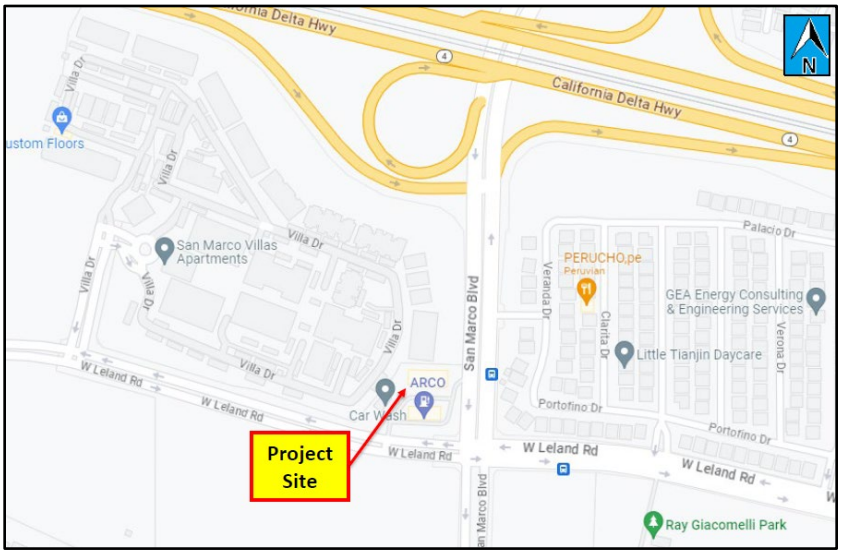
What can I do if I have comments on the project?
Comments or objections to the project can be made by writing or through e-mailed testimony prior to the meeting or provided orally during the meeting. Written comments citing the project name may be emailed to the project planner listed above or may be mailed or delivered to Pittsburg Planning Division, 65 Civic Avenue, Pittsburg, CA 94565.

Pursuant to Section 65009 of the California Government Code, if you challenge this matter in court, you may be limited to those issues you or someone else raised at the public hearing described in this notice, or in written correspondence on the matter delivered to this agency at, or prior to the public hearing. Any written correspondence delivered to the Planning Division before the hearing body's action on the matter will become a part of the administrative record.

Para información en español:
(925) 252-4920

JOHN FUNDERBURG, SECRETARY
PITTSBURG PLANNING COMMISSION

Project Title: AM/PM – Alcohol Sales, AP-23-0062 (UP)
Location: 2102 W Leland Road, APN: 091-050-038





City of Pittsburg
Community and Economic Development Department - Planning Division
65 Civic Avenue
Pittsburg, CA 94565

NOTICE OF PUBLIC HEARING

From: Veronica Maya
To: Alison Hodgkin
Cc: David Carrillo
Subject: Re: AM/PM Convenience Store project AP-23-0062
Date: Thursday, May 25, 2023 12:04:55 PM
Attachments: ~WRD0002.jpg

External Sender: Use caution before opening links or attachments

Hi Alison,

Thanks again for the information you sent over to the Center for Human Development. My name is Veronica Maya, and I work with the Pittsburg-Bay Point Community Coalition. The coalition is comprised of local community residents like me who are concerned with the access underage youth have to alcohol, cannabis, tobacco, and other drugs. We strongly oppose the request for Project No: AP-23-0062 request to include the sale of "distilled spirits" to the public at the AM/PM convenience store located at 2102 W Leland Road.

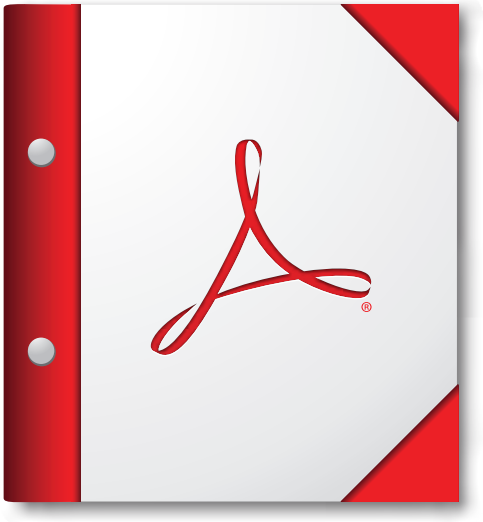
Our concerns about distilled spirits are well documented by consumer watchdog groups. Hard or Spiked Seltzers have been actively marketed by the alcohol industry to teenagers and are packaged with bright colors that look like non-alcoholic drinks, denote sweet flavors and have "cool" fun names. These products are often priced lower than similar non-alcoholic drinks and are placed on convenience market shelves near chocolate milk and orange juice with similar packaging, or located across from the candy aisle.

The store applying for the use permit is located nearby family housing units and a community park where children and youth live and play. Four schools are located within a two-mile radius of the AM/PM store in question.

Why is there a public necessity to sell distilled spirits when such products are known to target market youth? We ask that the City of Pittsburg consider rejecting the aforementioned request because the sale of distilled spirits poses unaddressed risk factors for underage drinking.

Thanks,

Veronica Maya
Community Coordinator Pittsburg - Bay Point
Center for Human Development
Website | chd-prevention.org
E-mail veronica@chd-prevention.org
Office: 925-755-4728 Cell: 415-933-2365



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CITY OF PITTSBURG
PLANNING COMMISSION
STAFF REPORT
July 22, 2025

ITEM: Consideration of a Resolution Granting a Use Permit and Design Review and adoption of an Initial Study/Mitigated Negative Declaration and Mitigation Monitoring Reporting Program for the Pencco Iron Salts Manufacturing Facility, AP-23-0167 (UP, DR)

ORIGINATED BY: Dillon Blaine of Pencco Inc. 831 Bartlett Road, Sealy, Texas 77474

SUBJECT: The proposed project consists of two applications, for a Use Permit and Design Review for the construction and operation of an iron salts (water treatment and purification product) manufacturing facility at the Corteva industrial complex located at 901 Loveridge Road. The parcel (073-220-049, Lot L8) is zoned General Industrial (IG) and is designated Industrial in the 2040 General Plan.

RECOMMENDATION: Staff recommends that the Planning Commission adopt a Resolution granting the Use Permit and Design Review application and adoption of an Initial Study/ Mitigated Negative Declaration and Mitigation Monitoring Reporting Program for AP-23-0167 Pencco Iron Salts Manufacturing Facility, subject to conditions.

BACKGROUND: On December 12, 2023, Dillon Blaine, on behalf of Pencco Inc., filed an application for a Use Permit and Design Review for the construction and operation of an iron salts manufacturing facility at the Corteva industrial complex located at 901 Loveridge Road. The project site at 901 Loveridge Road is located in a heavy industrial area of the City and is bordered by other industrial operations.

On June 24, 2025, this application was scheduled to be heard by the Planning Commission. At this hearing the Planning Commission continued this item to a date specific of July 22, 2025.

PROJECT DESCRIPTION:

Existing Conditions:

The project site consists of a 1.38-acre property area leased from Corteva (APN: 073-220-049, Lot L8). The parcel is zoned General Industrial (IG) and is and has a General Plan designation of Industrial. The proposed project area is fully developed and consists of three existing buildings and a large, paved parking/storage area within the developed Corteva industrial complex.

The 1.38-acre project site is within Corteva's larger approximately 200-acre developed industrial complex. Corteva's 200-acre industrial complex contains chemical manufacturing plants operated by Corteva and others, water processing facilities, loading and unloading facilities, materials and waste storage areas, vehicle and equipment maintenance and fueling areas, closed and operating landfills, and areas utilized by various contractors.

The site is located on non-major streets off of Loveridge Road, approximately 1/2 mile south and inland of the New York Slough. Residential areas are located approximately 0.9 miles west of the Project site, and 0.9 miles to the south across State Route (SR) 4. There are no schools or other sensitive receptors located adjacent to the Project site boundaries.

Refer to Attachment 3 for the site plan map and Attachment 6 for a map of the surrounding uses.

Proposed Project:

The proposed Pencco facility would utilize the existing buildings onsite for a control lab and office building and a maintenance building with additional office space. The remainder of the project site would consist of a containment area for the manufacturing process (described in detail below), an open truck parking lot with truck loading and scales, and automobile parking with associated landscaping. Major facility components would consist of:

- 10 reactor tanks ranging from 10 to 13 feet in diameter and 16 to 20 feet in height (volume ranging from 10,000 to 24,000 gallons)
- 18 storage tanks ranging from 8 to 25 feet in diameter and 10 to 30 feet in height (volume ranging from 4,000 to 100,000 gallons)
- Two-stage air scrubber components including water and caustic scrubber, scrubber fan, and stack (20 feet tall) ranging from 2.7 to 6 feet in diameter
- Cooling Tower (12 feet in diameter and 10 feet in height)
- Filter press, ore and scrap containment areas, overhead crane, air compressor, and sump pump drains.

As a national provider of wastewater and drinking water treatment products. Pencco, Inc. will ship the outbound finished iron salts products such as ferrous chloride, ferric chloride, and ferric sulfate to wastewater treatment plants and water purification facilities nationwide.

GENERAL PLAN/CODE COMPLIANCE:

General Plan: The project site is designated ‘Industrial’ under the 2040 General Plan. This designation is intended to provide sites for manufacturing, processing, and general services. The General Plan includes goals that specifically apply to the ‘Loveridge Subarea’ where the project site is located. Specifically, Goal-2-7: Support the development and expansion of regionally-oriented commercial activities and maintain industrial activities in appropriate, designated areas. The project would be consistent with this General Plan goal because it locates a new manufacturing plant in an existing regionally oriented industrial established area that sources raw materials from the adjacent Corteva plant.

Zoning: The project site is zoned 'IG (General Industrial) District'. The proposed use falls under the classification of 'heavy manufacturing' as defined by Pittsburg Municipal Code (PMC) section 18.08.100(C). Any use falling under this classification requires approval of a Use Permit prior to its operation in the IG District. Design Review is also required for projects involving the construction of buildings over 120 square feet (PMC section 18.36.200).

Required Use Permit Findings: In accordance with PMC section 18.16.040, a Use Permit may be granted only if the Planning Commission can make findings that the proposed use:

1. is in accord with the objective of the Zoning Ordinance, the purposes of the land use district in which it is located and is appropriate to the specific location;

2. is not detrimental to the health, safety, and general welfare of the City;

3. will not adversely affect the orderly development of property within the City;

4. will not adversely affect the preservation of property values and the protection of the tax base and other substantial revenue sources within the City;

5. is consistent with the objectives, policies, general land uses and programs specified in the general plan and applicable specific plan;

6. will not create a nuisance or enforcement problem within the neighborhood;

7. will not encourage marginal development within the neighborhood;

8. will not create a demand for public services within the City beyond that of the ability of the City to meet in light of taxation and spending restraints imposed by law; and

9. is consistent with the City's approved funding priorities.

Required Findings – Design Review: In accordance with PMC section 18.36.220(B), Design Review approval may be granted only if the Planning Commission can make findings that:

A. the structure conforms with good taste, good design and in general contributes to the character and image of the City as a place of beauty, spaciousness, balance, taste, fitness, broad vistas, and high quality;

B. the structure will be protected against exterior and interior noise, vibrations and other factors that may tend to make the environment less desirable;

C. the exterior design and appearance of the structure is not of inferior quality as to cause the nature of the neighborhood to materially depreciate in appearance and value;

D. the structure is in harmony with proposed developments on land in the general area; and

E. the application conforms with the criteria set forth in any applicable City adopted Development Review Design Guidelines.

Environmental: On January 22, 2025, staff published and circulated an Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed project. The minimum 30-day public review and comment period for the environmental determination began on January 22, 2025, and ended at 5:00 p.m. on February 21, 2025**.**

The Initial Study found the project would have less-than-significant impacts in the areas of Aesthetics, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazardous Materials, Hydrology and Water Quality, Public Services, Transportation and Traffic, Tribal Cultural Resources, and Utilities and Service Systems. The Initial Study found the project would have no impacts in the areas of Agricultural and Forestry Resources, Biological Resources, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Recreation, and Wildfire.

Refer to Attachment 1 – Exhibit A for the Initial Study/Mitigated Negative Declaration.

The Initial Study found the project would have less-than significant impacts with mitigation provided in the area of Air Quality. As such, a Mitigation Monitoring Reporting Program (MMRP) that identifies the mitigation measures being proposed has been prepared for adoption by the Planning Commission.

Refer to Attachment 1 – Exhibit B for the MMRP.

Public Notice: On or prior to July 10, 2025, notice of the July 22, 2025, public hearing was posted at City Hall, near the proposed project site, and on the 'Public Notices' section of the city's website; was delivered for posting at the Pittsburg Library; and was mailed via first class or electronic mail to the applicant, to the property owner, to owners of property located within 300 feet of the proposed pilot project site, to local service agencies expected to provide services to the building, and to individuals who had previously filed written request for such notice, in accordance with Pittsburg Municipal Code (PMC) section 18.14.010 and Government Code section 65091. The notice was also posted on www.nextdoor.com ("Nextdoor") and was sent directly to all subscribed residents in the adjacent Nextdoor neighborhoods.

ANALYSIS:

Staff has reviewed the proposed project and believes it conforms and would be consistent with the City's Zoning Ordinance and zoning for the site. As such, the proposed project promotes an orderly development of the Corteva site area by utilizing a vacant portion of the existing plant site zoned for industrial use.

Additionally, the site is zoned 'IG (General Industrial) District' and is intended for the highest intensity industrial uses.

Public Comments and Responses

The City received five letters during the public comment period on the Draft IS/MND for the proposed project. Pacific Gas and Electric (PG&E) issued a letter on February 19, 2025, with no comments on the environmental analysis other than stating that the proposed project does not appear to directly interfere with existing PG&E facilities or impact their easement rights.

Caltrans issued a letter dated February 20, 2025, with no comments on the environmental analysis other than confirming that the project would have less than significant Vehicle Miles Traveled (VMT) impacts.

Amah Mutsun Tribal Band of Mission San Juan Bautista issued a comment letter on January 23, 2025, and the Confederated Villages of Lisjan Nation issued a letter on January 30, 2025. Adams Broadwell Joseph & Cardozo issued a comment letter on February 21, 2025. Staff has prepared responses to those letters in a *"Response to Comments Document*" referenced as Attachment 2 in the staff report and has provided summary responses below.

Amah Mutsun Tribal Band of Mission San Juan Bautista

On January 23, 2025, the Amah Mutsun Tribal Band of Mission San Juan Bautista's provided comments on the IS/MND. The letter made recommendations about the appropriate treatment of ancestral remains, associated grave regalia and subsurface features if discovered at the project location as well as the appropriate crew and professional consultation to ensure cultural resources are appropriately addressed.

The recommendations included the following:

- All Crews, Individuals and Personnel who will be moving any earth be Cultural Sensitivity Trained.
- A Qualified California Trained Archaeological Monitor is present during any earth movement.
- A Qualified Native American Monitor is present during any earth movement.

Staff's Response: The Conditions of Approval for the project incorporate the tribal recommendations to ensure the treatment of cultural resources is appropriately addressed.

Confederated Villages of Lisjan Nation

On January 30, 2025, Confederated Villages of Lisjan Nation provided comments on the (IS/MND). Responses received requested that the following conditions below be incorporated into the project. These requested project conditions are also consistent with the existing 2040 General Plan action item for protection of Cultural Resources 10-A-7.k:

- That Lisjan Nation be notified immediately if any cultural resources of Native American origin are inadvertently discovered during the project.

- To the measure concerning inadvertent discovery of human remains, we request the addition of this provision, there shall be no pictures taken or testing done on the Native American human remains.

- Inadvertent discovery of Tribal Cultural Resources: If cultural resources of Native American origin are identified during grading or excavation of the proposed project, all ground disturbing activities within 50 feet shall cease until an archeologist has evaluated the nature and significance of the find as a historic property and a representative from the Confederated Villages of Lisjan Nation is consulted by the government agency.

Staff's Response: The Conditions of Approval for the project incorporate the tribal recommendations to ensure the treatment of cultural resources is appropriately addressed.

Adams Broadwell Joseph & Cardozo

On February 21, 2025, Adams, Broadwell, Joseph, and Cardozo (ABJC) on behalf of Safe Fuel and Energy Resources (SAFER CA) provided comments on the IS/MND. In their letter they claim that the IS/MND fails to provide a comprehensive and meaningful evaluation of all the project's possible adverse effects and lacks substantial evidence to support its conclusion that there will be no significant environmental impacts with the implementation of mitigation. ABJC asserts that substantial evidence supports a fair argument that the proposed Project may cause potentially significant, unmitigated air quality, public health, geology, hazards, and land use impacts, which requires the City to prepare an environmental impact report ("EIR").

Staff's Response: The analysis conducted for the Draft IS/MND found no evidence indicating that the project site currently, or previously, supported operations that could have caused soil and groundwater contamination beneath the parcel.

The Corteva Agriscience Industrial Complex (Corteva property) has been involved in chemical use and production for many decades and is included on the “Cortese List” due to past releases that led to soil and groundwater contamination. However, the project area itself has not been identified on regulatory databases nor have soil and groundwater investigations been mandated by regulatory agencies. The project area, which consists mostly of a paved parking lot, has not been graded and has been in its current configuration and state for at least 23 years.

Additionally, there is no substantial evidence to support a fair argument that the proposed project would result in potentially significant hazard impacts. There is no evidence that historical or current site operations have contaminated soil or groundwater. While the larger Corteva industrial complex has reported soil and groundwater contamination, its extent appears not to have substantially impacted the project site. The Corteva property has been under active remediation for almost 6 years and current groundwater data indicates the remediation is effective and groundwater concentrations of VOCs are decreasing. As an additional measure to safeguard construction workers during site grading, the Soil Management Plan (SMP), proposed as part of the project, would be implemented to monitor soil and identify unanticipated contamination.

Staff has proposed a Mitigated Negative Declaration for adoption by the Planning Commission, as all impacts can be reduced to less than significant with the mitigation measures contained in the recommended Conditions of Approval.

June 24, 2025 Comment Letter

On June 24, 2025, staff received a late comment letter prior to the regularly scheduled Planning Commission hearing for this project. Adams, Broadwell, Joseph, and Cardozo (ABJC) on behalf of Safe Fuel and Energy Resources (SAFER CA) wrote to object staff’s recommendation that the Planning Commission approve the project on the grounds that the City has not complied with the California Environmental Quality Act (“CEQA”) and lacks substantial evidence to support the findings required to approve the Project’s entitlements.

ABJC argued that:

1. The City fails to evaluate the accidental release of acutely hazardous air pollutants by improperly relying on regulatory compliance without any site-specific Analysis.

Staff’s Response: As required by law, Pencco would prepare a Risk Management Plan (RMP) to develop protocols to reduce the potential for the release of hazardous materials and response actions that would protect workers and the public if a release were to occur. The Project’s required compliance with California Accidental Release Prevention Program (CalARP) regulations would effectively mitigate any reasonably foreseeable accidental release of hydrogen chloride, sulfuric acid, or chlorine through

the development of the required RMP and associated Offsite Consequence Analyses (OCA,) management systems requirements, prevention programs, and emergency response programs. Review and approval by the Contra Costa Health's Hazardous Materials Programs CCHSHMP would ensure the Project's compliance with CalARP and audits would occur for the lifetime of the Project at least once every three years.

Furthermore, the location of the Project is designed to effectively mitigate a reasonably foreseeable accidental release of hazardous materials as it is situated within Corteva's approximately 200-acre developed industrial complex along with other facilities that use hazardous substances such as chemical manufacturing plants and is sited greater than one mile from sensitive receptors (residences, schools, etc.).

2. ABJC also contends that the City improperly defers analysis and mitigation of hazard materials impacts related to soil contamination, and challenges the conclusion that the Project site is free of soil or groundwater contamination, claiming the conclusion is based solely on the absence of prior testing rather than affirmative evidence demonstrating the site's environmental condition.

Staff's Response: The analysis conducted for the Draft IS/MND found no evidence indicating that the Project site currently, or previously, supported operations that could have caused soil and groundwater contamination beneath the parcel. The Corteva Agriscience Industrial Complex (Corteva property) has been involved in chemical use and production for many decades and is included on the "Cortese List" due to past releases that led to soil and groundwater contamination. However, the Project site itself has not been identified on regulatory databases nor have soil and groundwater investigations been mandated by regulatory agencies. The Project site, which consists mostly of a paved parking lot, has been in its current configuration for at least 23 years. The Corteva property has been under active remediation for almost 6 years and current groundwater data indicates the remediation is effective and groundwater concentrations of VOCs are decreasing. As an additional measure to safeguard construction workers during site grading, the Soil Management Plan (SMP), proposed as part of the Project, would be implemented to monitor soil and identify unanticipated contamination.

3. ABJC claims the City fails to analyze the acute non-carcinogenic hazard risks associated with exposure to construction-related diesel particulate matter ("DPM") deficient because it does not assess acute hazard impacts for any receptors, including on-site construction workers, who are particularly vulnerable to short-term exposure to DPM.

Staff's Response: BAAQMD Guidance 11 clearly states that worker receptors "Are off-site locations where people work, including indoor and outdoor areas and commercial/industrial areas currently zoned or planned to be zoned for manufacturing, light or heavy industry, office, or retail activity (page E-14)." Future on-site construction workers associated with constructing a proposed Project are not included in health risk assessments. This is consistent with OEHHA Guidance12 which states "Onsite workers are protected by CAL OSHA and typically are not evaluated under the Hot Spots

program. Exceptions may include a worker who also lives on the facility property such as at prisons, military bases, and universities that have worker housing within the facility (page 8-25)." Worker housing is not proposed under the Project and therefore it was appropriate to not consider onsite construction worker impacts in the Draft IS/MND. Furthermore, DPM impacts were included and analyzed in the Draft IS/MND for off-site receptors and other sensitive receptors, which resulted in the implementation of **Mitigation Measure AQ-2**, which requires construction equipment greater than 25 horsepower to meet Tier 4 Final emissions standards, or electric or alternative-fueled (i.e., non-diesel).

4. ABJC claims the City cannot make the findings required to approve the requested use permit or design review application. Given the potentially significant, unmitigated air quality, public health, and hazard impacts, the Planning Commission cannot find that the proposed project is not detrimental to the health, safety, and general welfare of the City.

Staff's Response: City staff disagrees and has proposed findings (enclosed as Attachment 1) in the affirmative. Upon implementation of the applicable mitigation measures as identified in the Mitigation Monitoring Reporting Program, potential air quality impacts, can be mitigated and reduced to less than significant to support approval of the requested Use Permit and Design Review application.

Again, staff has reviewed the comment letter dated June 24, 2025, in detail, and determined that, no new or greater environmental concerns were raised that were not originally addressed in the IS/MND. ABJC has not presented any substantial evidence to support a fair argument of any new or greater adverse environmental impacts. Instead, the contentions in their letters are factually incorrect; are based only on speculation and conjecture, which is not substantial evidence (14 Cal. Code Regs. § 15384(a)); or demonstrate only a policy disagreement with the project. Staff has proposed a Mitigated Negative Declaration for adoption by the Planning Commission, as all impacts can be reduced to less than significant with the mitigation measures contained in the recommended Mitigation Monitoring Report Program (MMRP).

See Attachment 2 for a full discussion of comments and responses.

ACTION REQUIRED:

Move to adopt a Resolution approving Use Permit and Design Review Application No. 23-0167, subject to conditions as set forth in the Resolution adopting the Initial Study/Mitigated Negative Declaration and associated Mitigation Monitoring Reporting Program.

ATTACHMENTS:

1. Proposed Resolution
   - Initial Study/Mitigated Negative Declaration (Exhibit A)
   - Mitigation Monitoring Reporting Program -MMRP (Exhibit B)
2. Comment Letters and Responses
3. Project Plans
4. Development Review Design Guidelines
5. Property Development Regulation
6. Map of Surrounding Uses
7. Public Hearing Notice

Prepared by: Maurice Brenyah-Addow, Senior Planner

BEFORE THE PLANNING COMMISSION OF THE CITY OF PITTSBURG

In the Matter of:

Approval of Use Permit and Design Review application for Pencco Iron Salts Manufacturing Plant Project located at 1901 Loveridge Road, AP-23-0167(UP, DR) and Adopting a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program for the Project	)	Resolution No.

The Planning Commission of the City of Pittsburg DOES RESOLVE as follows:

Section 1. Background

A. On December 12, 2023, Dillon Blaine of Pencco Inc., filed a Use Permit and Design Review application (AP-23-0167) for the construction and operation of an iron salts (for water treatment and purification) manufacturing facility (project) at the Corteva industrial complex located at 1901 Loveridge Road. The project site consists of a 1.38-acre (59,960.6 square feet) property leased from Corteva (APN #073-220-049, Lot L8). The parcel is zoned General Industrial (IG) and is designated Industrial in the 2040 General Plan. The project site is fully developed and consists of three small existing buildings and a large, paved parking/storage area within the developed Corteva industrial complex.

B. The proposed project is governed by the Pittsburg 2040 General Plan and Pittsburg Municipal Code (PMC) Title 18 (Zoning).

C. The proposed project is subject to the California Environmental Quality Act (Public Resources Code Section 21000, et. seq.), and the State CEQA Guidelines (14 California Code of Regulations Section 15000, et seq., (collectively, “CEQA”).

D. On January 22, 2025, staff published and circulated an Initial Study/Mitigated Negative Declaration (IS/MND) for the project for a 30-day public review and comment pursuant to CEQA Guidelines Section 15073. The City received five letters during the public comment period on the Draft IS/MND for the project, and one late letter after the comment period closed.

E. On June 24, 2025, application AP-23-0167 was scheduled to be heard by the Planning Commission. At this hearing, the Planning Commission continued this item to a date specific of July 22, 2025.

F. On or prior to July 10, 2025, notice of the July 22, 2025, public hearing was posted at City Hall, near the proposed project site, and on the ‘Public Notices’ section of the City’s website; was delivered for posting at the Pittsburg Library; and was mailed via first class or electronic mail to the applicant, to the property owner, to owners of property located within 300 feet of the proposed pilot project site, to local service agencies expected to provide services to the building, and to individuals who had previously filed written request for such notice, in accordance with Pittsburg Municipal Code (PMC) section

18.14.010 and Government Code section 65091. The notice was also posted on www.nextdoor.com (“Nextdoor”) and was sent directly to all subscribed residents in the adjacent Nextdoor neighborhoods.

G. On July 22, 2025, the Planning Commission held a duly-noticed public hearing on AP-23-0167, at which time all interested persons had the opportunity to present testimony, which the Planning Commission considered.

Section 2. Findings

A. Based on the Planning Commission Staff Report entitled, “Consideration of a Resolution Granting a Use Permit and Design Review and adoption of an Initial Study Mitigated Negative Declaration (IS/MND) and Mitigation Monitoring Reporting Program (MMRP) for the Pencco Inc., iron salts manufacturing Project, AP-23-0167 (UP, DR)” and based on all the information contained in the Planning Division files on the proposed project, incorporated herein by reference and available for review in the Planning Division located at 65 Civic Avenue in Pittsburg, and based on all written and oral testimony presented at the meeting, the Planning Commission finds that:

1. All recitals above are true and correct and are incorporated herein by reference.

2. The Initial Study/Mitigated Negative Declaration (IS/MND) and Mitigation Monitoring Reporting Program (MMRP) for the project was prepared in compliance with CEQA and the Planning Commission has independently reviewed and considered the information contained therein.

Environmental Findings (CEQA)

The Planning Commission has reviewed the IS/MND and the MMRP; all comments received regarding the IS/MND; presentations, reports, and comments by City staff and other experts; and public testimony; and, based on the whole record before it, finds that:

A. All projects impacts are less than significant or can be reduced to a level of less than significant with identified mitigation.

B. No substantial evidence has been presented sufficient to support a fair argument of adverse impacts that are new or greater than those identified in the IS/MND. In making this finding, the Planning Commission has reviewed, specifically, the February 21, 2025, and June 24, 2025, letters submitted by Adams, Broadwell, Joseph, and Cardozo (ABJC) on behalf of Safe Fuel and Energy Resources (SAFER CA), and makes the following findings:

1. SAFER CA’s contention that the project has potential unmitigated impacts requiring preparation of an environmental impact report (EIR) is unfounded and unsupported by facts.

2. Contrary to ABJC’s claim that the City fails to evaluate the accidental release of acutely hazardous air pollutants by improperly relying on regulatory compliance without any site-specific Analysis, Pencco would prepare a Risk Management Plan (RMP) as required by law to develop protocols to reduce the potential for the release

of hazardous materials and response actions that would protect workers and the public if a release were to occur. The Project's required compliance with California Accidental Release Prevention Program (CalARP) regulations would effectively mitigate any reasonably foreseeable accidental release of hydrogen chloride, sulfuric acid, or chlorine through the development of the required RMP and associated Offsite Consequence Analyses (OCA) management systems requirements, prevention programs, and emergency response programs. Review and approval by the Contra Costa Health's Hazardous Materials Programs CCHSHMP would ensure the Project's compliance with CalARP and audits would occur for the lifetime of the Project at least once every three years.

3. Contrary to ABJC's contention that the City improperly defers analysis and mitigation of hazard materials impacts related to soil contamination, and challenges the conclusion that the Project site is free of soil or groundwater contamination, claiming the conclusion is based solely on the absence of prior testing rather than affirmative evidence demonstrating the site's environmental condition, the analysis conducted for the Draft IS/MND found no evidence indicating that the Project site currently, or previously, supported operations that could have caused soil and groundwater contamination beneath the parcel.

4. Contrary to ABJC cliams that the City fails to analyze the acute non-carcinogenic hazard risks associated with exposure to construction-related diesel particulate matter ("DPM") deficient because it does not assess acute hazard impacts for any receptors, including on-site construction workers, who are particularly vulnerable to short-term exposure to DPM, BAAQMD Guidance11 clearly states that worker receptors "Are off-site locations where people work, including indoor and outdoor areas and commercial/industrial areas currently zoned or planned to be zoned for manufacturing, light or heavy industry, office, or retail activity (page E-14)." Future on-site construction workers associated with constructing a proposed Project are not included in health risk assessments. This is consistent with OEHHA Guidance12 which states "Onsite workers are protected by CAL OSHA and typically are not evaluated under the Hot Spots program.

5. Contrary to ABJC's claim that the City cannot make the findings required to approve the requested use permit or design review application. Given the potentially significant, unmitigated air quality, the Planning Commission cannot find that the proposed project is not detrimental to the health, safety, and general welfare of the City, City staff has proposed findings in the affirmative. Upon implementation of the applicable mitigation measures and conditions of approval, potential negative air quality, public health, and hazard impacts can be mitigated and reduced to less than significant to support approval of the requested Use Permit and Design Review application. ABJC has not presented any substantial evidence to support a fair argument of any new or greater adverse environmental impacts. Instead, the contentions in their letters are factually incorrect; are based only on speculation and conjecture, which is not substantial evidence (14 Cal. Code Regs. § 15384(a)); or demonstrate only a policy disagreement with the project.

C. Based on the findings set forth in this Resolution, the Planning Commission finds that (1) the IS/MND was prepared in compliance with CEQA;

(2) with the incorporation of mitigation measures identified in the MMRP and all conditions of approval that are being concurrently adopted, there is no substantial evidence that the project will have a significant effect on the environment; and

(3) the IS/MND reflects the independent judgment and analysis of the Planning Commission.

The Planning Commission hereby adopts the IS/MND and MMRP for the project.

Use Permit Findings (PMC section 18.16.040):

A. The proposed project will be in accordance with the objectives of the Zoning Ordinance, the purpose of the land use district in which it is located and is appropriate to the specific location, in that the proposed heavy manufacturing activity is a conditionally permitted use in the IG District. The project includes an installation of a new water treatment and purification production plant that is consistent with both the existing zoning and with other industrial uses in the immediate surroundings.

B. The proposed project will not be detrimental to the health, safety, and general welfare of the City, in that upon compliance with applicable conditions of approval and mitigation measures, it will meet health and safety requirements of the Community and Economic Development Department, the Contra Costa Fire Protection District, Contra Costa Health Services – Hazardous Materials Programs, and the Regional Water Quality Control Board.

C. The proposed project will not adversely affect the orderly development of property within the City, in that it is located an expansion of an existing use in a general industrial area already designated for such uses in the 2040 General Plan and zoned for such uses.

D. The proposed project will not adversely affect the preservation of property values and the protection of the tax base and other substantial revenue sources within the City, in that the project will utilize the site for an industrial purpose consistent with its General Industrial zoning and 2040 General Plan land use designation.

E. The proposed project will be consistent with site's 'Industrial' General Plan land use designation, in that the designation is intended to provide sites for manufacturing uses. The project is also consistent with the General Plan Economic Development policies and actions of the 2040 General Plan which support retention and expansion of the City's manufacturing base and encourage employment growth.

F. The proposed project will not create a nuisance or enforcement problem within the neighborhood, in that it will be required to meet performance standards, as set forth by PMC chapter 18.82, which are intended to address any potential safety, noise, odor, and maintenance concerns.

G. The proposed project will not encourage marginal development within the neighborhood, in that the project will consist of a water treatment and purification product manufacturing plant similar to other industrial installations at the Corteva Agriscience industrial campus.

H. The proposed project will not create a demand for public services within the City beyond that of the ability of the City to meet in light of taxation and spending restraints imposed by law, in that the project will have access to existing infrastructure, including fire, police, and water services.

I. The proposed project will not be inconsistent with the City's approved funding priorities, in that it does not require any City funding.

Design Review Findings (PMC section 18.36.220(A)):

A. The Planning Commission makes the following findings regarding each aspect of the project, to the extent the issues are applicable:

1. Maximum height, lot coverage and setbacks (if not covered in the zoning ordinance); The project complies with all applicable development standards including the height limit, lot coverage and setbacks for the IG zone.

2. Overall mass and bulk of structures;
The overall mass and bulk of the proposed plant structures is consistent with the rest of the existing structures at the plant site and surrounding industrial plants.

3. Special features of the development, such as walls, screen, towers and signs;
The special features of the proposed plant installations include storage tanks, distillation/cooling towers, piping and supporting structures are consistent with the surrounding industrial properties and zoning.

4. Effective concealment and sound attenuation of exposed mechanical and electrical equipment; The site perimeter has existing fencing to minimize public view, however the scale of the installations are industrial in nature so some equipment such as storage tanks, distillation and cooling towers and supporting structures and piping will be reasonably visible. This is consistent with the appearance of other industrial uses and manufacturing plants in the area within the Corteva Agriscience campus such as K2 Pure Solutions and Douglas Products.

5. Colors and materials on the exterior face of building or structure, striving for a limited number of colors and materials for each project; The exterior materials, finishes and colors will be required to be consistent and harmonious with the surroundings.

6. Avoidance of repetition of identical entities whenever possible;
The various equipment are varied in sizes and shapes and interconnected with pipes and support structures that minimize monotony in appearance.

7. Harmonious relationship with existing and proposed adjoining developments, avoiding both excessive variety and monotonous repetition, but allowing similarity of style, if warranted;
   The proposed new installations are sited and organized in an orderly manner and will be harmonious with the existing site structures and adjacent industrial sites.

8. Pleasing landscaping which incorporates existing landscaping and terrain as a complement to the structure, using plants which thrive in the Pittsburg climate and which are large enough in size to be effective. A condition of approval requires attractive landscaping around the perimeter of the site to minimize visual impacts on adjacent properties.

B. The Planning Commission further finds:

1. The structure conforms with good taste, good design and in general contributes to the character and image of the City as a place of beauty, spaciousness, balance, taste, fitness, broad vistas, and high quality, in that the proposed new installations are sited and organized in an orderly manner. The project structures and supporting equipment varies in size and shape to minimize monotony in appearance. The site perimeter has existing fencing to minimize public view.

2. The structure will be protected against exterior and interior noise, vibrations and other factors that may tend to make the environment less desirable, in that the project is required to meet applicable performance standards to minimize potential noise and vibration impacts. As demonstrated in the IS/MND, there are no significant adverse noise impacts from the project.

3. The exterior design and appearance of the structure is not of inferior quality as to cause the nature of the neighborhood to materially depreciate in appearance and value in that, the proposed equipment has been designed to have sleek and less reflective finishes to minimize adverse visual impacts on the surroundings.

4. The structure is in harmony with proposed developments on land in the general area in that, the proposed equipment is similar to the other structures at the existing plant site, and the project is consistent with existing zoning and the General Plan 2040 land use designation for the site.

5. The application conforms with the criteria set forth in applicable Development Review Design Guidelines (DRDG), in that the proposed plant has been analyzed in accordance with the applicable DRDGs and found to be conforming in terms compatibility of materials with the surroundings, visibility from public view, screening, landscaping, parking areas and varied forms and rooflines.

Section 3. Decision

Based on the findings set forth above, the Planning Commission hereby adopts the Initial Study/Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program (Attachment 1 – Exhibits A and B) of this resolution and approves Use Permit and Design

Review Application No. 23-0167, subject to the following conditions listed below.

Planning Conditions

1. Conformity with Project Plans: The proposed iron salts manufacturing plant shall be established in substantial conformity with the project plans date-stamped December 12, 2023, except as may be hereinafter modified. Any major changes to the project plans shall be subject to review and approval by the Planning Commission at the City Planner's discretion.

2. Hazardous Materials Business Plan: The applicant shall submit a Hazardous Material Business Plan (HMBP) to the Contra Costa Health Services – Hazardous Materials Programs (CCHSHMP) prior to commencement of facility operations. The HMBP shall describe in detail the type and volume of all chemicals to be used at the facility and must include a reporting and monitoring process for any spills that may occur. It shall also include requirements for safety equipment, automatic shut-off valves, and other safety procedures that may be required, depending on the types and volumes of chemicals stored and used.

3. Landscaping: Around the perimeter of the site abutting the public rights-of-way, adjacent properties, and where determined feasible by the City Planner, the applicant shall install a combination of drought-tolerant plants, trees, shrubs and ground cover in all the existing landscape areas located throughout the site. Installation shall be completed prior to commencement of facility operations.

4. Lighting: All lighting shall be arranged to reflect light away from adjoining properties and public rights-of-way. In general, lighting fixtures shall be shielded to prevent glare on adjoining properties and public rights-of-way.

5. Heat, Humidity, and Odors: The facility shall not produce an unreasonable, disturbing, or unnecessary emission of heat, humidity, or odors at the property line of the site that causes material distress, discomfort or injury to the average person (PMC sections 18.82.035 and 18.82.045).

6. Noise: The facility shall comply with PMC Chapter 9.44 (Noise). Applicant shall limit generation of loud noises during construction between the hours of 8:00 am and 5:00 pm.

7. Property Maintenance: Each exterior of a building or other structure shall be kept in a good state of repair and the exterior finish shall be kept clean and well maintained. The entire site including paved, unpaved, and landscaped areas shall be kept in a neat and orderly manner, free of weeds, loose trash, debris, and other litter (PMC section 18.82.050).

8. Graffiti Removal: All graffiti shall be removed on any part of the property within 48 hours of its appearance.

9. Green Building Features: The project shall meet the Nonresidential Mandatory Measures specified under the 2019 California Green Building Standards Code, Part

II. In addition to those measures, the project shall implement the following Nonresidential Voluntary Measures:

Nonresidential Voluntary Measures:

A5.106.5.1 Designated parking for clean air vehicles
A5.405.5 Cement and concrete.
A5.508.1.3 Hydrochlorofluorocarbons (HCFCs), or
A5.508.1.4 Hydrochlorofluorocarbons (HCFCs).

Compliance with this condition shall be shown on the construction drawings submitted for building permits.

10. EV Spaces and EVSE: At least two (2) Electric Vehicle (EV) spaces with Electric Vehicle Supply Equipment (EVSE) shall be installed, consistent with Guideline IV.D.4 of the City of Pittsburg Development Review Design Guidelines (Planning Commission Resolution No. 9864). The installed EVSE shall be 'Level 2', capable of charging at 30 amperes or higher at 208 or 240 volts. The appropriate permissive and regulatory signage shall be provided immediately adjacent to each EV space in accordance with California Manual on Uniform Traffic Control Devices and Title 24 of the California Building Code. Compliance with this condition shall be shown on the construction drawings and improvement plans submitted for building and engineering permits. The applicant may incorporate more conduit for additional EVSE in the future.

11. Environmental Mitigation Measures: The applicant shall comply with the mitigation measures identified in and detailed in the attached Mitigation Monitoring Reporting Program (Attachment 1 - Exhibit B):

Building Division Conditions of Approval

12. On the cover sheet, please indicate the building Design Codes applicable to this project. The City of Pittsburg has adopted and enforces the following building Design Codes: 2022 California Administrative Code (CAC), 2022 California Building (CBC), 2022 California Historical Building Code (CHBC), 2022 California Existing Building Code (CEBC), 2022 California Green Building Standards Code (CGBSC), 2022 California Mechanical Code (CMC), 2022 California Plumbing Code (CPC), 2022 California Electrical Code (CEC), 2022 California Energy Code (CEC Part 6), 2022 California Fire Code and the Pittsburg Municipal Code (RMC). Reference CBC Sec. 107.

13. On the cover sheet, please verify the Drawing Index includes all plan sheets. Reference CBC Sec. 107.

14. On the cover sheet, provide or verify the Code Analysis includes the proposed tenant's Use, Occupancy Group, Type of Construction, Separated or Nonseparated Mixed Occupancies, whether or not the building is Fire Sprinkled, Floor Area (S.F.), Number of Stories and Occupant Load. Reference CBC Sec. 111, 302.1, 401, 503, 508, 601, 903 and 1004.1.

15. The preparation of plans or specifications for commercial buildings and tenant improvements shall be performed by a licensed architect or engineer (Exception: Interior alterations that involve only non-bearing partitions). The licensed architect or engineer shall affix a stamp to the plans as evidence of the person's responsibility for the documents. Licensed Mechanical, Plumbing and Electrical Contractors may design the systems that they are to install.

16. The Site Plan shall include code compliant accessible parking spaces and access aisles, and an accessible route from accessible parking spaces to all entrances and exterior ground floor exits. The clear width for sidewalks and walks shall be 48" minimum. The slope of the accessible route shall not exceed 1:20 (5%) in the direction of travel for walking surfaces, 1:12 (8.3%) in the direction of travel for ramps, and the cross slope shall not exceed 1:48 (2%). The slope of curb ramps shall not exceed 1:12 (8.3%). Where the accessible route crosses onto a vehicular route of travel, provide a 36" long continuous detectable warning mat where the pedestrian path crosses or adjoins the vehicular way, such as a driveway, to warn of potential hazards.

17. At least one accessible route shall be provided within the site from accessible parking spaces and accessible loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve. Where more than one route is provided, all routes must be accessible.

18. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.

19. All exterior and interior accessibility requirements for this project, shall be designed and built to chapter 11B of the California Building Code.

20. SFRWCB Guidelines: Applicant shall employ San Francisco Regional Water Quality Control Board guidelines and incorporate acceptable Best Management Practices for control of onsite materials, dust and sediment stabilization and proper handling of materials. BMP provisions shall include:

    a. Implementation of hazardous or contaminated materials-handling procedures such as placing materials into lined bins with covering.

    b. Designation of appropriate parking and fueling areas;

    c. Deploying applicable dust and runoff-control measures;

    d. Delineating a site perimeter to prevent disturbing areas outside the project limits;

    e. Implementing hazardous materials storage, containment, and control measures such as secondary containment berms; and

    f. Diverting upstream run-on safely around or through the construction project.

Engineering Conditions – Fees

21. Grading Plan Review Fees: If the project will require grading of 50 cubic yards or more, the applicant will be required to obtain a grading permit. The applicant shall provide an initial payment for review of the grading plans with the first submittal. The grading plan review fee is based on the engineer's estimated cost for site grading, which shall be submitted with the plans. The grading plan check fee is 2.5% of the cost for grading, or it may be based upon cubic yards of earth disturbance as set forth in the City's Master Fee Schedule. Fifty percent (50%) of the total fee is to be paid with the initial submittal of plans and engineer's cost estimate. This initial payment will be credited towards the final fee. The fee balance shall be due payable prior to issuance of the grading permit.

22. Grading Inspection Fees: If the project will require grading of 50 cubic yards or more, the applicant will be required to pay a grading inspection fee at the time of grading permit issuance. The grading inspection fee is 3% of the engineer's estimated cost of grading, or it may be based upon an approved engineer's estimate of total cubic yards, according to the current schedule of grading fee charges as set forth in the City's Master Fee Schedule.

23. Facility Reserve Charge: If the project will require an increase in size of water or sewer services to accommodate the project, the applicant shall pay the City of Pittsburg Facilities Reserve Charge (PMC Chapters 13.08, 13.12 and 13.24) (the "FRC") to the Engineering Division, for water and sewer service in the incremental amounts in effect when the applicant obtains a building permit. The applicant understands that the current FRC on file, effective August 20, 2005, shall be paid in accordance with the fee schedule approved by Resolution No. 05-10290, and amended by Resolution No. 12-11778, on February 21, 2012, a copy of which is available at the City. This fee shall be due payable prior to issuance of building permits.

Engineering Conditions – NPDES

24. Stormwater Pollution Protection During Construction: There will be no excavation activities during wet weather. If the project requires grading of 50 cubic yards or more, the applicant will be required to obtain a grading permit. Prior to issuance of the grading permit, the applicant shall submit the following to the Engineering Divisions for review: an Erosion and Sedimentation Control Plan or Stormwater Pollution Prevention Plan if the project requires a permit from the State Water Resources Control Board under the provisions of the General Construction Permit. The Stormwater Pollution Prevention Plan measures shall also include measures to prevent soil, dirt, and debris from entering the storm drain system, in accordance with California Stormwater Quality Association's (CASQA's) construction handbook.

25. Water Discharge: The facility shall not discharge liquids of any kind into a public or private sewage system, watercourse, body of water, or the ground, except in compliance with California Water Code, Division 7, Article 4. If water is encountered during excavation it shall only be discharged into the storm drain as permitted by PMC

15.88.030(B)(4).

26. State Industrial General Permit Coverage: The applicant shall obtain coverage under the State General Industrial Permit for any discharge of wastewater to New York Slough. Proof of permit coverage from the State Water Boards shall be submitted to the Engineering Division prior to commencement of facility operations.

27. Soil Management Plan: The Project Applicant shall prepare a Soil Management Plan (SMP) for the construction phase of the Project to protect workers if unanticipated soil contamination is encountered during demolition and grading. The SMP shall outline the procedures contractors are to follow if soils contaminated with hydrocarbons, Volatile Organic Compounds (VOCs), or pesticides are encountered during disturbance and removal of onsite soils. Procedures set forth in the SMP shall include standard industry accepted protocols, which could include active air monitoring for VOCs, soil sampling, soils segregation, and pre-disposal chemical screening. The SMP shall be required to be submitted to the City for review and acceptance prior to issuance of building permits.

28. Contra Costa Health: The Project shall comply with all applicable Contra Costa Health Hazardous Materials Programs, including but not limited to the California Accidental Release Prevention (CalARP) Program and Business Plan Program.

Cultural Resources

29. There shall be no pictures taken or testing done on Native American human remains.

30. If cultural resources of Native American origin are identified during grading or excavation of the proposed project, all ground disturbing activities within 50 feet shall cease until an archeologist has evaluated the nature and significance of the find as a historic property and a representative from the applicable Native American Tribe is consulted by the government agency. If the entity in consultation with the consulting Tribe(s), determines that the resource is a Tribal Cultural Resource and thus significant under CEQA, the entity shall retain a qualified archeologist and a Tribal monitor, at the applicant's expense, to prepare a mitigation plan, which shall be implemented in consultation with the consulting Tribe. The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is not feasible, the plan shall outline appropriate treatment of the resource in coordination with the consulting Tribe and, if applicable, a qualified archeologist. Examples of appropriate mitigation for Tribal Cultural Resources include, but are not limited to, protecting the cultural character and integrity of the resources, protecting traditional use of the resources, protecting the confidentiality of the resources, or heritage recovery.

Standard Conditions

31. Grounds for Revocation: Operation in a manner inconsistent with that described in the staff report, violation of a zoning regulation or condition of this resolution, existence of a public nuisance, or conviction of a federal or state law or city ordinance in connection with the operation of the use shall be grounds for revocation of the use permit (PMC section 18.28.100).

32. Standard Conditions of Development: The Standard Conditions of Development as adopted by the Pittsburg Planning Commission by Resolution No. 8931 shall apply as conditions of approval for this project as applicable. Where there is a conflict between the Standard Conditions of Development and the project-specific conditions identified in this resolution, the specific conditions of this resolution shall govern.

33. Other Agency Requirements: The applicant shall comply with all the requirements of the City's Community Development Department, Contra Costa County Fire Protection District, and all other applicable local, state and federal agencies.

    It is the responsibility of the applicant to contact each local, state, or federal agency for requirements that may pertain to this project.

34. Indemnification: Applicant agrees to indemnify, defend, and hold harmless the City, its officials, officers, employees, agents and consultants from any and all administrative, legal or equitable actions or other proceedings instituted by any person challenging the validity of this project approval, subsequent project approval, or other action arising out of, or in connection with, this project approval. The parties shall cooperate in defending such action or proceeding. The parties shall use reasonable efforts to select mutually agreeable defense counsel but, if the parties cannot reach agreement, City may select its own legal counsel at applicant's sole cost and expense. Applicant may select its own legal counsel to represent applicant's interests at applicant's sole cost and expense. Applicant shall pay for City's costs of defense, whether directly or by timely reimbursement to City on a monthly basis. Such costs shall include, but not be limited to, all court costs and attorneys' fees expended by City in defense of any such action or other proceeding, plus staff and City Attorney time spent responding to and defending the claim, action or proceeding.

35. Expiration of Approval: This use permit will expire on June 24, 2028, unless the use has been legally established, or a written request for extension is filed with the Planning Division prior to the expiration date and subsequently approved by the Planning Commission.

Section 4. Effective Date

This resolution shall take effect immediately upon its adoption.

On motion by Commissioner _____, seconded by Commissioner _____, the foregoing resolution was passed and adopted the 22nd day of July 2025, by the Planning Commission of the City of Pittsburg, California by the following vote:

AYES:
NAYES:
ABSTAIN:
ABSENT:

I hereby certify that the above Resolution No. ____ was adopted by the Planning Commission of the City of Pittsburg on July 22, 2025.

_____
JOHN FUNDERBURG M.S., SECRETARY
PITTSBURG PLANNING COMMISSION

Attachment 1 (Exhibit A)

PENCCO IRON SALTS MANUFACTURING FAICLITY

Draft Initial Study/Mitigated Negative Declaration

January 2025

Prepared for:

City of Pittsburg
Planning Division
65 Civic Avenue
Pittsburg, CA 94565

Prepared by:

RCH Group, Inc.
PO Box 516
Rancho Murieta, CA 95683
916.782.4427

RCH GROUP
planning & environmental consulting

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ENVIRONMENTAL CHECKLIST

ADMINISTRATIVE DRAFT INITIAL STUDY

1.	**Project Title:**	Pencco Iron Salts Manufacturing Facility
2.	**Lead Agency Name and Address:**	City of Pittsburg Planning Division 65 Civic Avenue Pittsburg, CA 94565
3.	**Contact Person and Phone Number:**	Maurice Brenyah-Addow Senior Planner (925) 252-4261
4.	**Project Location:**	APN #073-220-049 Lot L8, (1.38 Acres) 901 Loveridge Road Pittsburg, CA 94565
5.	**Project Sponsor:**	Dillon Blaine Project Engineer Pencco, Inc. 831 Bartlett Road Sealy, TX 77474
6.	**General Plan Designation:**	Industrial
7.	**Zoning:**	General Industrial (IG)

8. Description of Project:

Project Overview

As a national provider of wastewater and drinking water treatment products, Pencco, Inc. (the Applicant) is proposing to build a new iron salts manufacturing facility (the "Project" or "facility") on property leased from Corteva (APN #073-220-049, Lot L8) at 901 Loveridge Road in Pittsburg, CA. The parcel is zoned General Industrial (IG) and is designated Industrial in the City of Pittsburg 2040 General Plan.

The Project purpose is to relieve Northern California iron salts supply issues. These supply deficiencies have disrupted normal operations for local treatment plants causing many to resort to different treatment methods, which results in unplanned costs. The Project would help stabilize the supply of adequate water treatment products.

Project Site

The Project site consists of a 1.38-acre (59,960.6 square feet) property leased from Corteva (APN #073-220-049, Lot L8) at 901 Loveridge Road in Pittsburg, CA. The parcel is zoned General Industrial (IG) and is designated Industrial in the City of Pittsburg 2040 General Plan. The Project site is fully developed and consists of two small existing buildings and a large, paved parking/storage area within the developed Corteva industrial complex. **Figure 1** shows the Regional Location, and **Figure 2** shows the Project Location.

Surrounding Land Uses and Setting

The 1.38-acre Project site is within Corteva's larger approximately 200-acre developed industrial complex[1] located in Pittsburg, California (See **Figure 2**). Corteva's 200-acre industrial complex contains chemical manufacturing plants operated by Corteva and others, water processing facilities, loading and unloading facilities, materials and waste storage areas, vehicle and equipment maintenance and fueling areas, closed and operating landfills, and areas utilized by various contractors (Jacobs, 2019).

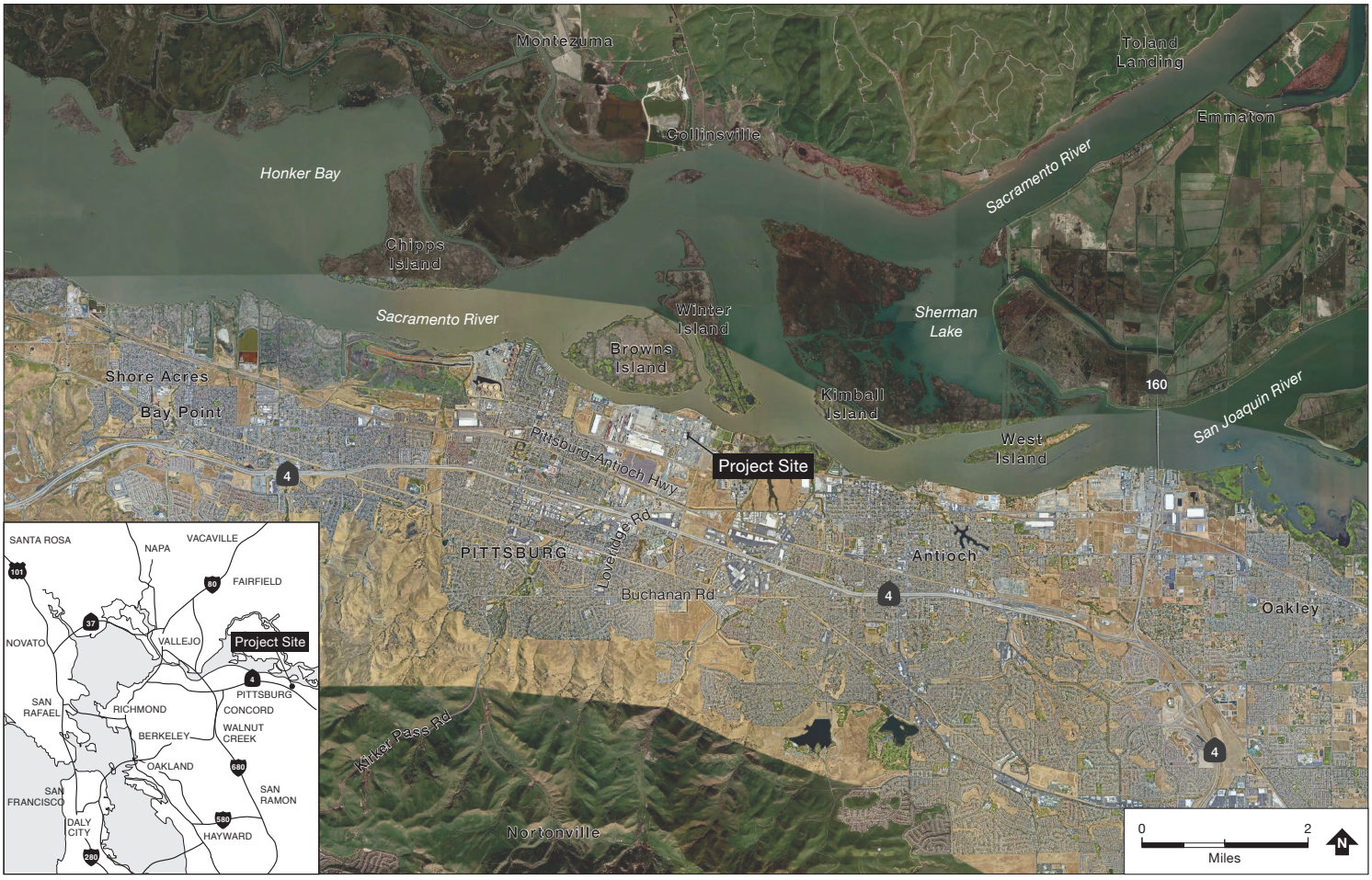
The nearest residences are approximately one mile southwest of the Project site along Columbia Street. The nearest school, Martin Luther King Jr. Junior High School, is approximately 1.1 miles southwest of the Project site. The nearest park, Central Park, is approximately one mile southwest of the Project site.

Project Elements

The facility would utilize the existing buildings onsite for a control lab and office building and a maintenance building with additional office space. The remainder of the Project site would consist of a containment area for the manufacturing process (described in detail below), an open truck parking lot with truck loading and scales, and automobile parking with associated landscaping. Major facility components would consist of:

- 10 reactor tanks ranging from 10 to 13 feet in diameter and 16 to 20 feet in height (volume ranging from 10,000 to 24,000 gallons)
- 18 storage tanks ranging from 8 to 25 feet in diameter and 10 to 30 feet in height (volume ranging from 4,000 to 100,000 gallons)
- Two-stage air scrubber components including water and caustic scrubber, scrubber fan, and stack (20 feet tall) ranging from 2.7 to 6 feet in diameter
- Cooling Tower (12 feet in diameter and 10 feet in height)
- Filter press, ore and scrap containment areas, overhead crane, air compressor, and sump pump drains.

1 The total Corteva Agriscience facility consists of approximately 500 acres, about half of which is undeveloped.



Source: RCH Group; Google Earth Pro, 2024

Figure 1
Regional Location

RCHGROUP
planning & environmental consulting



Source: RCH Group; Google Earth Pro, 2024

Figure 2
Project Location

RCHGROUP
planning & environmental consulting

The manufacturing portion of the facility would be located outdoors, and no new buildings are included with the Project. **Figure 3** shows the proposed Site Plan, and **Figures 4**, **5**, and **6** show the building elevations of the proposed facility (north/south, east, and west).

Project Manufacturing Process

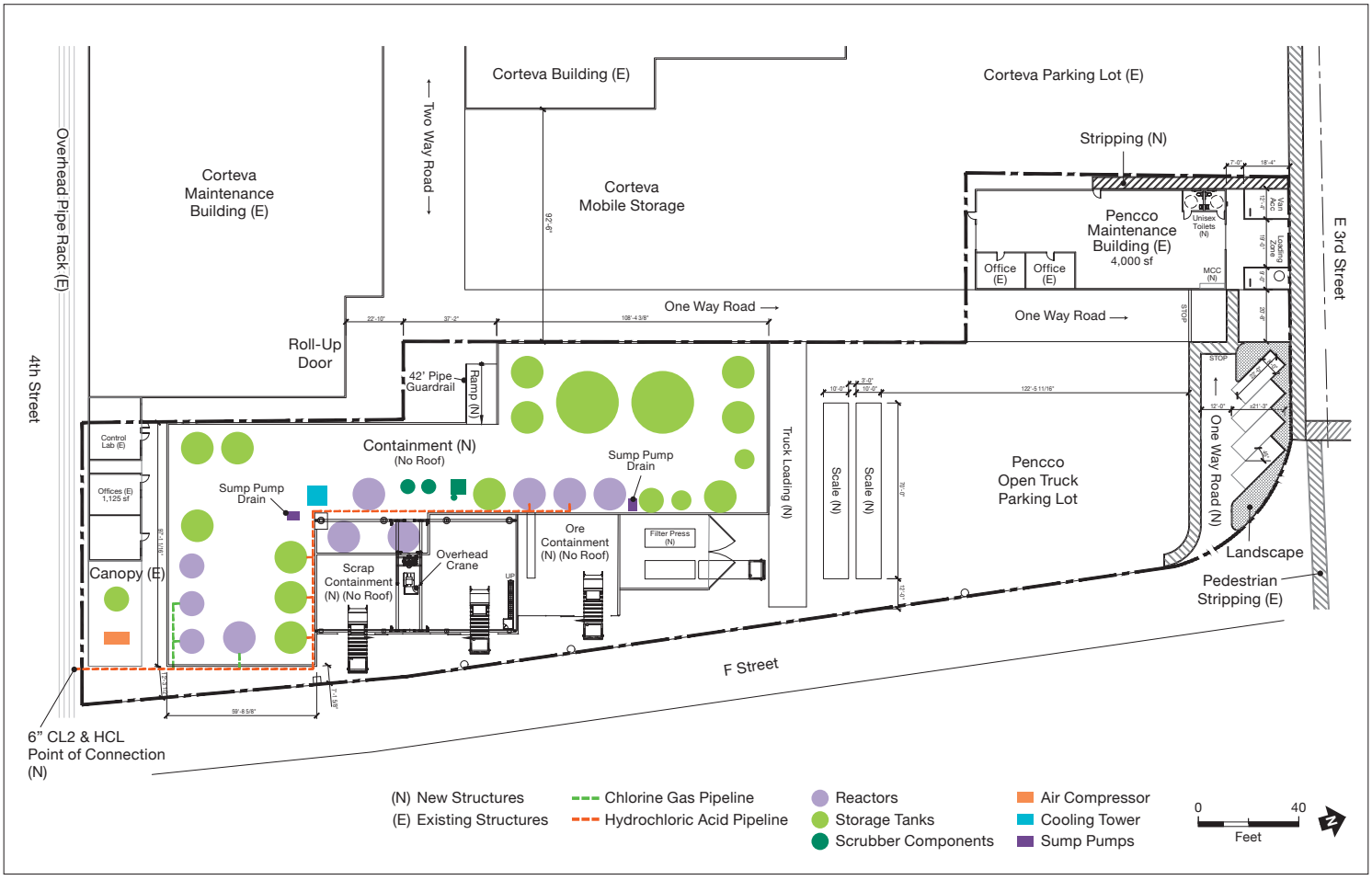
The manufacturing process involves dissolving iron ore and high-purity scrap iron with chlorine and hydrochloric Acid (HCL). These processes occur in reactors designed for the corrosive nature of this process. The iron salts manufactured at the proposed facility would be shipped to California's water treatment and wastewater treatment plants.

Trucks would deliver iron ore (magnetite), scrap steel, and spent pickling liquor[2] (SPL or ferrous chloride) to the facility for the raw iron material. The facility would also consume HCL and chlorine, which Pencco would purchase from Corteva or K2. The chlorine would be transported to the facility by pipeline from an existing chlorine plant within the overall Corteva industrial complex. The chlorine line is existing in the pipe rack and would need to be modified to direct the pipeline to the Project site. The chlorine line supplying the Project is currently 20 feet from the Project site boundary, so an additional 40 feet of chlorine piping would be constructed as part of the Project.

The HCL would be transported to the facility initially by tanker truck and then by pipeline once an HCL pipeline is available. The HCL pipeline from Corteva would be extended from the existing line adjacent to F Street and would require approximately 120 feet of piping to the Project tie in point. The facility would also use 98% sulfuric acid (H_2SO_4) in iron salts production and liquid oxygen (LOX). Both would be transported to the facility by tanker trucks. The Project also would use a 50% Sodium Hydroxide (NaOH) solution in the air scrubber for the facility to control fugitive emissions of HCL and chlorine. NaOH is a corrosive liquid that would also be delivered by tanker truck.

Permits would be required from the Bay Area Air Quality Management District (BAAQMD) for reaction vessels and the air scrubber. Process emissions would be emitted through one stack for the entire facility, which would be driven through the stack by the air scrubber fan. The fan would pull fugitive emissions from the processes into a packed-bed column scrubber.

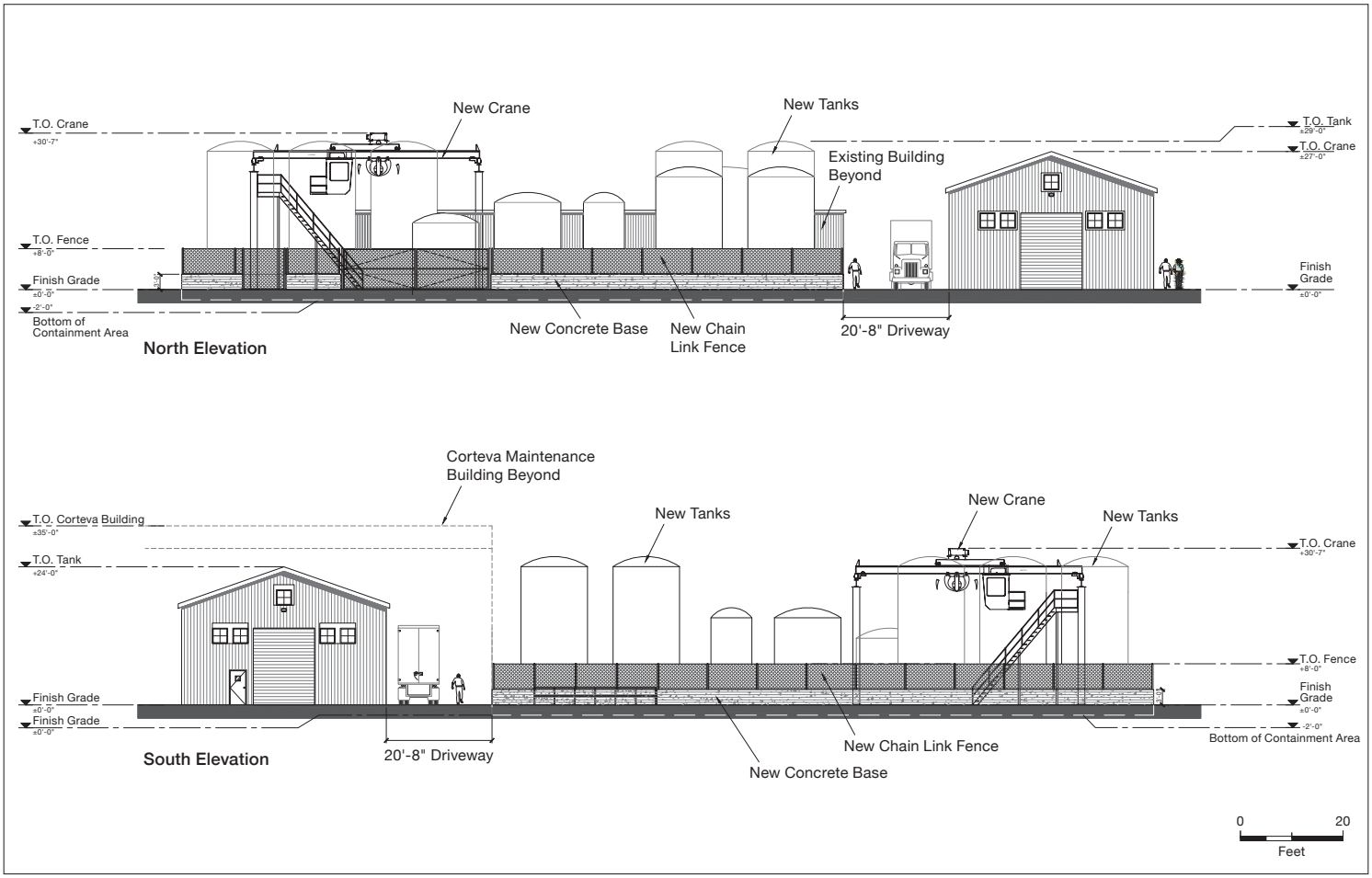
2 A hydrochloric acid (HCL) solution that's used to descale or clean steal and contains dissolved metal salts.



Source: Atelier 424, RCH Group, 2024

Figure 3
Site Plan

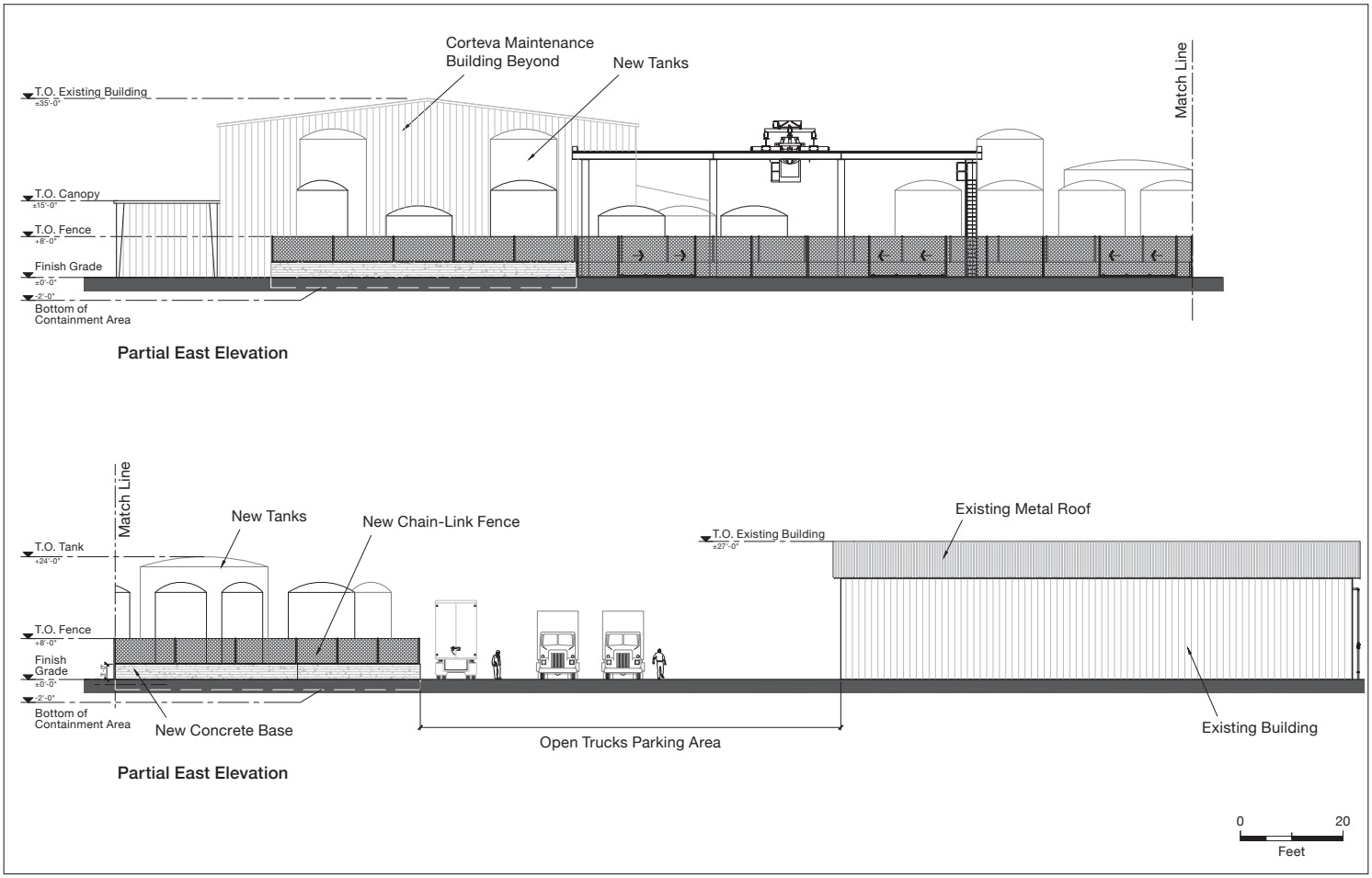
RCHGROUP
planning & environmental consulting



Source: Atelier 424, 2024

Figure 4
North and South Building Elevations

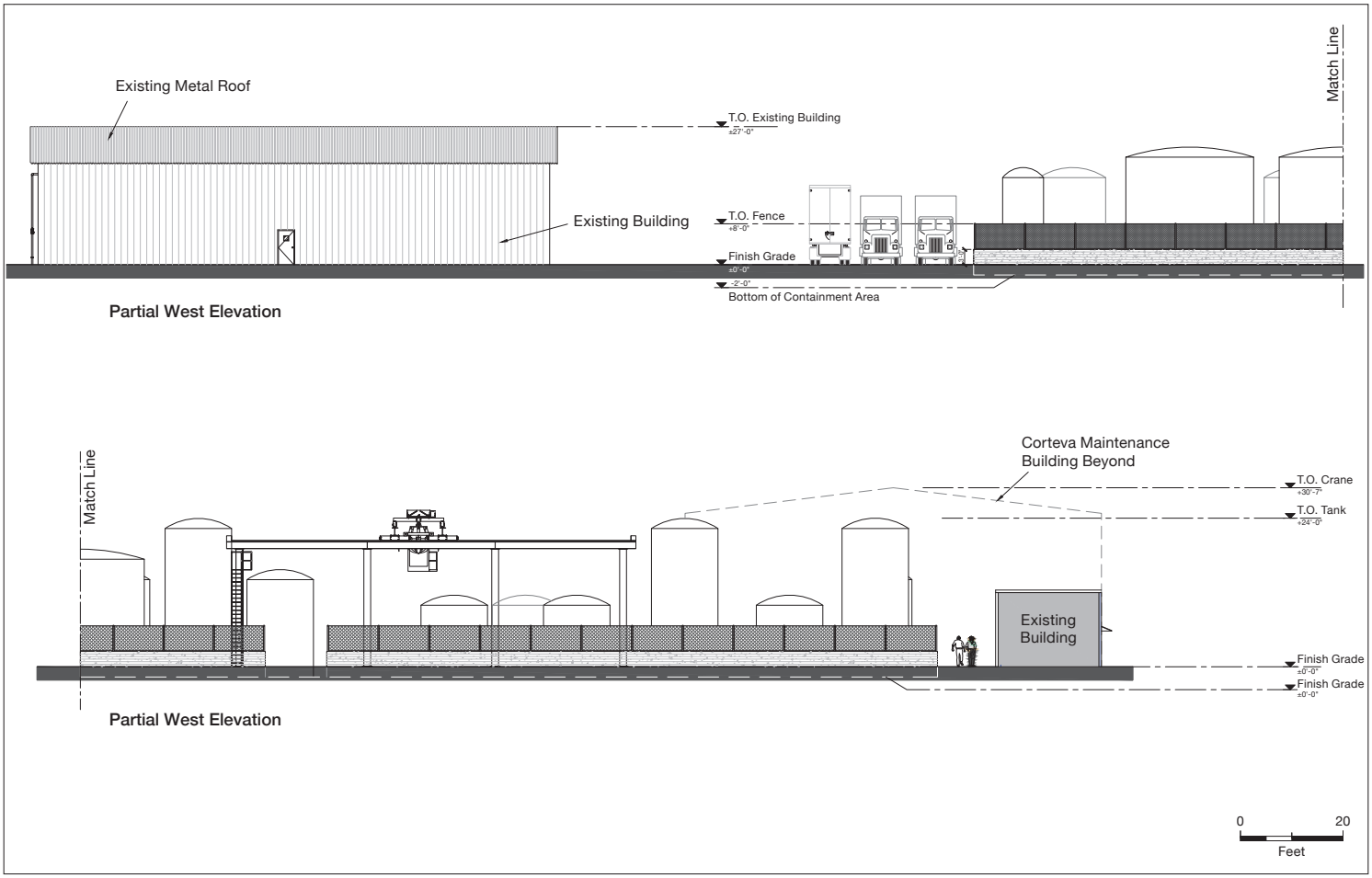
RCHGROUP
planning & environmental consulting



Source: Atelier 424, 2024

Figure 5
East Building Elevations

RCH GROUP
planning & environmental consulting



Source: Atelier 424, 2024

Figure 6
West Building Elevations

RCHGROUP
planning & environmental consulting

Pencco would ship finished products such as ferrous chloride, ferric chloride, and ferric sulfate from the facility by tanker trucks and railcars. Pencco would utilize its fleet of tanker trucks and company drivers. There may be occasions when Pencco would need the help of common carriers. These liquid products are hauled as corrosive (DOT[3] corrosion group 8) in tanker trucks and rubber-lined railcars. Pencco would also ship 20 cubic yard containers of nonhazardous filter cake, a dry solid sent mainly consisting of silica, carbon, and unreacted magnetite, to a nearby landfill. Pencco would generate approximately 10 tons of solids per month.

Incoming feedstock quantities for operating the facility are displayed in **Table 1**. Outgoing finished material quantities produced by the facility are displayed in **Table 2**.

TABLE 1 INCOMING FEEDSTOCK QUANTITITES (TONS)

Commodity	Hourly	Daily	Annual
Iron Ore	6	154	40,000
Scrap Steel	2	46	12,000
Hydrochloric Acid	6	154	40,000
Sulfuric Acid	3	77	20,000
Chlorine	3	77	20,000
Liquid Oxygen	0.33	8	2,000
Sodium Hydroxide	0.08	2	600

SOURCE: Pencco, 2024.

TABLE 2 OUTGOING FINISHED MATERIAL QUANTITITES (TONS)

Commodity	Hourly	Daily	Annual
Ferric Chloride	19	462	120,000
Ferrous Chloride	11	269	70,000
Ferric Sulfate	5	108	28,000
Filter Cake	0.02	0.46	120

SOURCE: Pencco, 2024.

Circulation and Parking

The Project site would be accessed via Loveridge Road from Highway 4. Five standard parking stalls and one van accessible parking stall would be provided within the Project site. Additional parking for project employees is available throughout the Corteva industrial complex.

3 United States Department of Transportation.

Stormwater System

All stormwater discharged from the Corteva industrial complex, including the Project site, is ultimately discharged to New York Slough in accordance with the General Permit for Stormwater Discharges Associated with Industrial Activities, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS00001 (Industrial General Permit [IGP]). Currently, stormwater generated on the Project site flows to the nearest storm drain inlet (there is existing stormwater infrastructure along the eastern edge of the Project site adjacent to F Street and just west of the Project site along the existing internal access road) where it is conveyed via Corteva's stormwater system to a 1.3-million-gallon (MG) concrete retention basin located at the north end of the Corteva industrial facility in the 500 block, adjacent to New York Slough.

Stormwater from the first storm event of the wet season, all process water, and stormwater that comes into contact with manufacturing processes would be conveyed to and retained in the concrete retention basin and then treated via the High Purity Water Process system for reuse as raw material for the manufacturing processes onsite. Stormwater from subsequent storm events would be discharged to New York Slough in accordance with the requirements of the Industrial General Permit. Discharge from the stormwater system can be stopped in the event of a spill of hazardous or polluting material by closing the outfall to New York Slough (Jacobs, 2019).

Energy Utilities

Electricity is currently provided to the Project site by Pacific Gas & Electric (PG&E). Natural gas would not be required. Electrical power needs for the Project are small, primarily to power small motors that would drive pumps, air compressors, scrubber fans, etc. The estimated annual electricity consumption is approximately 14,000 kilowatt hours (kWh).

Water Supply

The Project would connect to the City's domestic water supply for indoor water (indoor plumbing for employees) and manufacturing water consumption. Water infrastructure currently extends to the Project site at the northern boundary along E 3rd Street.

Wastewater

All wastewater and rainwater in contact with the manufacturing process are consumed as raw material, as the finished products are at least 50 percent water once manufactured. Project-generated wastewater not in contact with the manufacturing process (indoor plumbing for employees) would be conveyed by the municipal sewer system via existing infrastructure.

Construction Phasing and Schedule

Construction of the Project would occur intermittently over approximately 14 months from May 2025 through July 2026. Construction activities would typically take place Monday through Friday, 8 a.m. to 5 p.m. Construction of the Project would require demolition, site preparation, grading, building construction/equipment installation, paving, and architectural coating. Construction would require the export of 16,000 cubic yards of soil to make room for the recessed concrete containment floor. Demolition would consist of removing 27,000 square feet of existing pavement to make room for the new concrete containment area and truck scales. New paving would consist of 26,000 square feet of pavement and 1,000 square feet of asphalt for the new concrete containment area.

Soil Management Plan/ Soil Importation Plan

Construction of the Project would require demolition and grading and would require the removal and disposal of 16,000 cubic yards of soil in addition to 27,000 square feet of existing pavement. Given the length of time this site has operated within an industrial setting, there is a potential that soil underlying area proposed for construction have been impacted with contaminants that could represent a threat to human health of the environment. Public records do not indicate that an investigation of soil and groundwater contamination is currently necessary or has been conducted on the Project parcel in the past (SWRCB, DTSC, 2024). It is a recommended standard practice for construction projects in industrial settings to prepare a plan to address unanticipated soil contamination during demolition and grading activities. The Project would prepare and implement a Soil Management Plan (SMP), which outlines the procedures contractors are to follow if unanticipated soil contamination is encountered during construction grading and excavation.

Facility Operations and Staffing

Pencco would staff the facility with ten operators, ten truck drivers, and five managers and engineers. Most of the labor for the Project would come from local contract construction workers. At peak, the facility would operate 24 hours per day, five days per week (260 days per year). Project operations would require one propane-powered forklift, one propane-powered manlift, and one gasoline-powered skid steer, each operating an average of 2 hours per day.

10. Required Agency Approvals:

The Project requires City of Pittsburg's discretionary approval of the Use Permit and Design Review application, as well as ministerial approval of grading and building permits.

11. Tribal Consultation:

The City of Pittsburg notified the following tribes requesting Assembly Bill (AB) 52 notification for projects subject to CEQA. As of January 2025, no tribes have requested formal consultation.

1. The Ohlone Indian Tribe
2. Nashville Enterprise Miwok-Maidu-Nishinam Tribe
3. Confederated Villages of Lisjan Nation
4. Chicken Ranch Rancheria of Me-Wuk Indians
5. Guidiville Indian Rancheria
6. Indian Canyon Mutsun Band of Costanoan
7. Muwekma Ohlone Indian Tribe of the SF Bay Area
8. North Valley Yokuts Tribe
9. Amah Mutsun Tribal Band of Mission San Juan Bautista
10. Wilton Rancheria
11. Tule River Indian Tribe

References

California Department of Toxics Substances Control (DTSC). 2024. EnviroStor. Accessed 8/26/24. Online at: https://www.envirostor.dtsc.ca.gov/public/

California State Water Resources Control Board (SWRCB). 2024. GeoTracker. Accessed 6/26/24 Online at: https://geotracker.waterboards.ca.gov/

Federal Emergency Management Agency (FEMA), 2024. National Flood Hazard Layer FIRMette.

Jacobs, 2019. Industrial Stormwater Pollution Prevention Plan, Corteva Agriscience – Pittsburg Operations, 901 Loveridge Road, Pittsburg, California. March, 2019.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

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

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial study:

☐ 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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

MauriceBaddow
Signature

January 22, 2025
Date

Maurice Brenyah-Addow
Printed Name

AESTHETICS

Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
1.	**AESTHETICS —** Except as provided in Public Resources Code Section 21099, **would the proposed project:**				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	In non-urbanized 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?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

Discussion

a) **No Impact.** The Project site is fully developed and consists of existing buildings and pavement in the Corteva industrial complex. The Project would replace existing pavement with the manufacturing facility that would include associated reactors and tanks, some of which are 25 to 30 feet tall. The existing visual character of the surrounding area is highly industrial. There are no identifiable scenic vistas in the immediate area of the Project. Thus, development of the Project would not result in substantial adverse effects to scenic vistas. Therefore, the Project would result in no impact.

b) **No Impact.** The Project site is not within or near a designated state scenic highway. There are no identifiable scenic resources within the Project site, such as historic buildings or rock outcroppings. The Project would not substantially damage scenic resources within a state scenic highway. Therefore, the Project would result in no impact.

c) **Less-than-Significant Impact.** The Project site is fully developed and consists of existing buildings and pavement in the Corteva industrial complex. The Project would replace existing pavement with the manufacturing facility that would include associated reactors and tanks, some of which are 25 to 30 feet tall. The Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, the Project would result in a less-than-significant impact.

d) **Less-than-Significant Impact.** There is existing lighting associated with the Project site and surrounding area. The Project would require new lighting for nighttime operations and for safety/security purposes, as with the other industrial uses with the Corteva

industrial complex. Project development would comply with all applicable City lighting requirements. Therefore, the Project would result in a less-than-significant impact.

AGRICULTURAL AND FOREST RESOURCES

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
2. AGRICULTURAL AND FOREST RESOURCES — In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. **Would the proposed project:**				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Introduction

The Project site is fully developed and consists of existing buildings and pavement in the Corteva industrial complex. The Project site is zoned General Industrial (IG) and is designated Industrial in the City's 2040 General Plan. The Project site includes no forest land, timberland, or agricultural use, and is not under a Williamson Act contract.

Discussion

a) **No Impact.** The Project site does not contain any areas of Farmland of Statewide Importance. The Project site would not convert any farmland or agricultural uses to non-agricultural uses. Therefore, the Project would result in no impact.

b) **No Impact.** The Project site has not been used for agriculture and is not under a Williamson Act contract. Therefore, the Project would result in no impact.

c, d) **No Impact.** There are no areas classified as forest land, timberland, or farmland within the vicinity of the Project that may be affected by the development of the Project. Therefore, the Project would result in no impact.

e) **No Impact.** The Project would not result in loss of farmland or forest land. Therefore, the Project would result in no impact.

AIR QUALITY

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
3. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the proposed project:**				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Introduction

This section describes construction and operational air quality impacts associated with the Project and is consistent with the methods described in the Bay Area Air Quality Management District (BAAQMD) *CEQA Air Quality Guidelines* (BAAQMD, 2023). Detailed modeling assumptions and results are provided in **Appendix A**. The health risk assessment (HRA) prepared for the Project is provided in **Appendix B**.

Setting

The Project site is located within the San Francisco Bay Area Air Basin (Air Basin), which encompasses Alameda, Contra Costa, Santa Clara, San Francisco, San Mateo, Marin, and Napa Counties, and the southern portions of Solano and Sonoma Counties.

Climate, Meteorology, and Topography

Air quality is affected by the rate, amount, and location of pollutant emissions and the associated meteorological conditions that influence pollutant movement and dispersal. Atmospheric conditions, including wind speed, wind direction, stability, and air temperature, in combination with local surface topography (i.e., geographic features such as mountains, valleys, and San Francisco Bay), determine the effect of air pollutant emissions on local air quality.

The climate of the Air Basin, including Pittsburg, is a Mediterranean-type climate characterized by warm, dry summers and mild, wet winters. During summer and fall, conditions are favorable to the formation of photochemical pollutants, such as ozone and secondary particulates, such as sulfates and nitrates.

Criteria Air Pollutants

Concentrations of "criteria" air pollutants ("criteria" air pollutants are state and/or federally regulated) are used to indicate the quality of the air. These include ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter less than 10 micrometers (coarse or PM10), particulate matter less than 2.5 micrometers (fine or PM2.5), and lead. Regulation of air pollutants is achieved through both national and state ambient air quality standards (AAQS), and emissions limits for individual sources. Regulations implementing the federal Clean Air Act established national ambient air quality standards (NAAQS) for these six criteria pollutants. California has adopted more stringent California ambient air quality standards (CAAQS) for most of the criteria air pollutants. In addition, California has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. There are considerable differences between state and federal standards in California.

The AAQS are intended to protect the public health and welfare, with an adequate margin of safety. They are designed to protect those segments of the public most susceptible to respiratory distress, known as sensitive receptors, including asthmatics, the very young, elderly, people weak from other illness or disease, or persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollution levels somewhat above the ambient air quality standards before adverse health effects are observed.

Under amendments to the federal Clean Air Act, United States Environmental Protection Agency (U.S. EPA) has classified air basins or portions thereof, as either in "attainment" or "non-attainment" for each criteria air pollutant, based on whether or not the NAAQS have been achieved. The California Clean Air Act, which is patterned after the federal Clean Air Act, also requires areas to be designated as in "attainment" or "non-attainment" for the CAAQS. Thus, areas in California have one set of attainment / non-attainment designation with respect to the NAAQS and another set with respect to the CAAQS.

The Bay Area is currently designated "non-attainment" for 1-hour and 8-hour ozone CAAQS, the 8-hour ozone NAAQS, the PM10 CAAQS (annual and 24-hour), and the PM2.5 CAAQS (annual) and NAAQS (24-hour). The Bay Area is "attainment" or "unclassified" with respect to the other ambient air quality standards. Based upon the Bay Area's attainment status, pollutants

of greatest concern include criteria pollutant emissions such as nitrogen oxides (NO_x)[4], volatile organic compounds (VOC) as reactive organic gases (ROG)[5], PM10, and PM2.5.[6]

Toxic Air Contaminants

Toxic air contaminants (TACs) are regulated under both state and federal laws. Federal laws use the term "Hazardous Air Pollutants" (HAPs) to refer to the same types of compounds that are referred to as TACs under state law. Both terms encompass essentially the same contaminants. Under the 1990 Federal Clean Air Act Amendments, 189 substances are regulated as HAPs.

With respect to state law, in 1983 the California legislature adopted Assembly Bill 1807 (AB 1807), which establishes a process for identifying TACs and provides the authority for developing retrofit air toxics control measures on a statewide basis. Air toxics in California may also be regulated by the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (Assembly Bill [AB] 2588). Under AB 2588, TACs from individual facilities must be quantified and reported to the local air pollution control agency. The facilities are then prioritized by the local agencies based on the quantity and toxicity of these emissions, and on their proximity to areas where the public may be exposed. In establishing priorities, the air districts are required to consider the potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of the facility to potential receptors, and any other factors that the air district determines may indicate that the facility may pose a significant risk. High-priority facilities are required to perform a Health Risk Screening Assessment (HRSA), and if specific risk thresholds are exceeded, they are required to communicate the results to the public in the form of notices and public meetings. Depending on the health risk levels, emitting facilities can be required to implement varying levels of risk reduction measures. California Air Resources Board (CARB) identified approximately 200 TACs, including the 189 federal HAPs, under AB 2588.

The BAAQMD is responsible for administering federal and state regulations related to TACs. Under federal law, these regulations include National Emission Standards for Hazardous Air Pollutants (NESHAPs) and Maximum Achievable Control Technology (MACT) for affected sources. BAAQMD also administers the state regulations AB 1807 and AB 2588 which were discussed above. In addition, the agency requires that new or modified facilities that emit TACs perform air toxics screening analyses as part of the permit application. TAC emissions from new and modified sources are limited through the air toxics new source review program. Sources must use the Best Available Control Technology for Toxics (T-BACT) if an individual source cancer risk of greater than 1 in a million, or a chronic hazard index greater than 0.20, is identified in health risk modeling.

4 When combustion temperatures are extremely high, as in aircraft, truck and automobile engines, atmospheric nitrogen combines with oxygen to form various oxides of nitrogen (NOX). Nitric oxide (NO) and NO2 are the most significant air pollutants generally referred to as NOX. Nitric oxide is a colorless and odorless gas that is relatively harmless to humans, quickly converts to NO2 and can be measured. Nitrogen dioxide has been found to be a lung irritant capable of producing pulmonary edema.

5 VOC means any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions and thus, a precursor of ozone formation. ROG are any reactive compounds of carbon, excluding methane, CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, ammonium carbonate, and other exempt compounds. The terms VOC and ROG are often used interchangeably.

6 PM10 and PM2.5 consists of airborne particles that measure 10 micrometers or less in diameter and 2.5 micrometers or less in diameter, respectively. PM10 and PM2.5 represent fractions of particulate matter that can be inhaled into the air passages and the lungs, causing adverse health effects.

Local Air Quality

The BAAQMD maintains a network of monitoring stations within the Air Basin that monitor air quality and compliance with applicable ambient standards. The monitoring station closest to the Project site is the Concord Monitoring Station at 2975 Treat Boulevard, approximately 11 miles southwest of the Project site. The Concord Monitoring Station measures levels of ozone, PM10, PM2.5, and NO_2.

Table 3 summarizes the most recent three years of data (2020 through 2022) from the Concord Monitoring Station (2975 Treat Blvd). The 1-hour ozone CAAQS was exceeded once in 2021. The 8-hour ozone CAAQS and NAAQS were exceeded once in 2021. The 24-hour PM2.5 NAAQS was exceeded twice in 2020 and once in 2022. No other standards were exceeded at the Concord Monitoring Station during the three-year period.

TABLE 3 SUMMARY OF ANNUAL MONITORING DATA OF AMBIENT AIR QUALITY

Pollutant	Standard	2020	2021	2022
Ozone				
Maximum Concentration (1-hour/8-hour average)	ppm	**0.096/0.077**	0.079/0.062	0.065/0.055
Number of days State standard exceeded (1-hour/8-hour)	0.09/0.070	1/1	0/0	0/0
Number of days National standard exceeded (8-hour)	0.070	1	0	0
Coarse Particulate Matter (PM10)				
Maximum Concentration (24-hour)	µg/m^3	25.0	33.4	38.8
Number of days 24-hour standard exceeded (State/National)	50/150	0/0	0/0	0/0
Annual Average (State standard)	20	12.1	12.1	**
Fine Particulate Matter (PM2.5)				
Maximum Concentration (24-hour)	µg/m^3	**43.7**	28.7	**39.3**
Number of days National standard exceeded (24-hour measured/estimated)	35	2/2	0/0	1/1
Annual Average (State/National standard)	12/12.0	8.1/8.0	*/7.0	6.2/6.2
Nitrogen Dioxide (NO_2)				
Maximum Concentration (24-hour)	ppm	0.029	0.029	0.031
Number of days State standard exceeded (24-hour)	0.18	0	0	0
Annual Average (State standard)	0.030	0.005	0.005	0.004

NOTES:
ppm = parts per million, µg/m^3 = micrograms per cubic meter
bold values exceeded the State and/or National standard
** = insufficient data

SOURCE: CARB, *iADAM: Air Quality Data Statistics*, https://www.arb.ca.gov/adam, Accessed July 22, 2024.

Regional Air Quality Plans

The 1977 Clean Air Act amendments require that regional planning and air pollution control agencies prepare a regional Air Quality Plan to outline the measures by which both stationary and mobile sources of pollutants can be controlled in order to achieve all standards specified in the Clean Air Act. The 1988 California Clean Air Act also requires development of air quality plans and strategies to meet state air quality standards in areas designated as non-attainment (with the exception of areas designated as non-attainment for the state PM standards). Maintenance plans are required for attainment areas that had previously been designated non-attainment in order to ensure continued attainment of the standards. Air quality plans developed to meet federal requirements are referred to as State Implementation Plans.

Bay Area ozone levels have been greatly reduced in recent years, but the region still does not fully attain the CAAQS and NAAQS. The California Clean Air Act, as codified in the California Health and Safety Code, requires air districts that do not attain state ozone standards to prepare ozone plans. To that end, BAAQMD's 2017 Clean Air Plan serves to update the most recent Bay Area ozone plan, the 2010 Clean Air Plan. The Health and Safety Code requires that ozone plans propose a control strategy to reduce emissions of ozone precursors—ROG and NOx—and reduce transport of ozone and its precursors to neighboring air basins. The control strategy must either reduce emissions 5 percent or more per year, or include "all feasible control measures." Because reducing emissions of ozone precursors by 5 percent per year is not achievable, the control strategy for the 2017 Clean Air Plan is based on the "all feasible measures" approach.

2017 Clean Air Plan

The BAAQMD's *2017 Clean Air Plan* includes a comprehensive Regional Climate Protection Strategy, which identifies potential rules, control measures, and strategies that BAAQMD can pursue to reduce GHG emissions in the Bay Area. Measures of the 2017 Clean Air Plan addressing the transportation sector are in direct support of Plan Bay Area 2040, which was adopted by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC), and includes the region's transportation plan/ sustainable communities strategy.

Community Air Risk Evaluation

The BAAQMD's Community Air Risk Evaluation (CARE) program was initiated in 2004 to evaluate and reduce health risks associated with exposure to outdoor air toxics in the Bay Area. Based on findings of the latest report, DPM was found to account for approximately 85 percent of the cancer risk from airborne toxics. Collectively, five compounds—diesel PM, 1,3-butadiene, benzene, formaldehyde, and acetaldehyde—were found to be responsible for more than 90 percent of the cancer risk attributed to emissions. All these compounds are associated with emissions from internal combustion engines. The most important sources of cancer risk-weighted emissions were combustion-related sources of DPM, including on-road mobile sources (31 percent), construction equipment (29 percent), and ships and harbor craft (13 percent). A 75 percent reduction in DPM was predicted between 2005 and 2015 when the inventory accounted for CARB's diesel regulations. Overall, calculated cancer risk from TAC dropped by more than

50 percent between 2005 and 2015, when emissions inputs accounted for state diesel regulations and other reductions (BAAQMD, 2014b).

Modeled cancer risks from TAC were highest near sources of DPM: near core urban areas, along major roadways and freeways, and near maritime shipping terminals. The BAAQMD has identified Pittsburg and Antioch as "impacted" communities in the CARE Program (BAAQMD, 2014a). The average health impacts in the Bay Area, as determined both by pollution levels and by existing health vulnerabilities in a community, are approximately 160 cancer risk per million persons. For the City of Pittsburg, the health impact is approximately 146 cancer risk per million persons (BAAQMD, 2014a). Note, these health impacts are based on the CARE Program data that is roughly a decade old. Health impacts have likely decreased since DPM emission continue to decrease over time due to CARB and BAAQMD regulations and programs.

Sensitive Receptors

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive than the general public to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. The CARB has identified children less than 14 years of age, the elderly over 65 years of age, athletes, and those with cardiovascular and chronic respiratory diseases as most likely to be affected by air pollution. These groups are classified as sensitive population groups.

Residential areas are considered more sensitive to air quality conditions than commercial and industrial areas, because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational uses are also considered sensitive, due to the greater exposure to ambient air quality conditions and because the presence of pollution detracts from the recreational experience. According to the BAAQMD, workers are not considered sensitive receptors because all employers must follow regulations set forth by the Occupation Safety and Health Administration to ensure the health and well-being of their employees.

BAAQMD considers the relevant zone of influence for an assessment of air quality health impacts to be within 1,000 feet of a project site. The nearest sensitive receptors are residences approximately one mile southwest of the Project site along Columbia Street. The nearest school, Martin Luther King Jr. Junior High School, is approximately 1.1 miles southwest of the Project site. The nearest park, Central Park, is approximately one mile southwest of the Project site.

Significance Criteria

As stated in Appendix G of the CEQA *Guidelines*, the significance criteria established by the applicable air quality district may be relied upon to make the above determinations. Thus, according to the BAAQMD's *CEQA Guidelines*, the Project would result in a significant impact to air quality if it would result in the following:

- Average daily construction exhaust emissions of 54 pounds per day of ROG, NO_x, or PM2.5 or 82 pounds per day of PM10;
- Average daily operation emissions of 54 pounds per day of ROG, NOx, or PM2.5 or 82 pounds per day of PM10; or result in maximum annual emissions of 10 tons per year of ROG, NOx, or PM2.5 or 15 tons per year of PM10;
- Exposure of sensitive receptors to substantial levels of TAC resulting in (a) a cancer risk level greater than 10 in one million, (b) a noncancerous risk (chronic or acute) hazard index greater than 1.0, or (c) an increase of annual average $PM_{2.5}$ of greater than 0.3 micrograms per cubic meter ($\mu g/m^3$).
- Frequently and for a substantial duration, create or expose sensitive receptors to substantial objectionable odors affecting a substantial number of people.

Discussion

a) **Less-than-Significant Impact.** BAAQMD's *2017 Clean Air Plan* provides a roadmap for BAAQMD's efforts over the next few years to reduce air pollution and protect public health and the global climate. Determination of whether a project supports the goals in the *2017 Clean Air Plan* is achieved by a comparison of project-estimated emissions with BAAQMD thresholds of significance. If project emissions would not exceed the thresholds of significance after the application of all feasible mitigation measures, the project is consistent with the goals of the *2017 Clean Air Plan*. As presented in the subsequent impact discussions, the Project would not exceed the BAAQMD significance thresholds; therefore, it would not conflict with the goals of the *2017 Clean Air Plan* and would not hinder implementation of any of the control measures. Therefore, the Project would result in a less-than-significant impact.

b) **Less-than-Significant Impact with Mitigation.** The Project would generate air pollutant emissions during temporary construction activities and long-term operations.

Temporary Construction Activities

Construction-related activities would generate air pollutant emissions from off-road equipment; on-road trucks used for material delivery and equipment hauling; and worker commute trips. Fugitive dust emissions would also be generated by ground disturbance and would vary as a function of soil silt content, soil moisture, wind speed, and acreage of disturbance. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.24 (CAPCOA, 2022) and are summarized in **Table 4**. Detailed modeling assumptions and results are provided in **Appendix A**.

TABLE 4 ESTIMATED PROJECT AVERAGE DAILY CONSTRUCTION EMISSIONS

Condition	ROG lbs/day	NOx lbs/day	PM10 [1] lbs/day	PM2.5 [1] lbs/day
2025 Construction	0.32	3.86	0.12	0.11
2026 Construction	0.32	2.88	0.09	0.08
BAAQMD Thresholds of Significance	54	54	82	54
Potentially Significant?	No	No	No	No

NOTES:

1 PM10 and PM2.5 construction thresholds of significance apply to exhaust emission only. Fugitive PM10 and PM2.5 (fugitive dust) are less than significant assuming required best management practices are implemented.

SOURCE: CAPCOA, 2022.

BAAQMD's *CEQA Air Quality Guidelines* require that projects implement all the BAAQMD's basic best management practices (BMPs) for a project to have a less than significant construction-related fugitive dust emissions impact. Therefore, the Project would implement the required BMPs through **Mitigation Measure AQ-1** and construction would result in a less-than-significant impact with mitigation.

Mitigation Measure AQ-1: The applicant shall implement the following during construction of the Project:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.

- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted wood chips, mulch, or gravel.

- A publicly visible sign shall be posted with the telephone number and the person to contact the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Long-Term Operations

Long-term operational activities would generate air pollutant emissions primarily from motor vehicles (See **Table 10** for Project trip generation) and on-site equipment. Project operations would require one forklift, one manlift, and one skid steer, each operating 2 hours per day. Other emissions sources would include the cooling tower, and minor area sources such as cleaning chemicals/solvents. Operational emissions for the year 2027 are summarized in **Table 5**. Detailed modeling assumptions and results are provided in **Appendix A**.

TABLE 5 ESTIMATED PROJECT OPERATIONAL EMISSIONS

Source	ROG	NOx	PM10	PM2.5
Average Daily Operational Emissions (lbs)	30.74	2.75	20.77	0.19
BAAQMD Thresholds of Significance	54	54	82	54
Potentially Significant?	No	No	No	No
Annual Operational Emissions (tons)	5.58	0.50	2.73	0.03
BAAQMD Thresholds of Significance	10	10	15	10
Potentially Significant?	No	No	No	No

NOTES:

[1] Assumes an operational year of 2027.

SOURCE: CAPCOA, 2022.

As shown in **Table 5**, operational emissions would not exceed the BAAQMD's thresholds of significance. Therefore, the Project would result in a less-than-significant impact.

Cumulative Impacts

The BAAQMD *CEQA Air Quality Guidelines* recommend that cumulative air quality effects from criteria air pollutants also be addressed by comparison to the mass daily and annual thresholds. These thresholds were developed to identify a cumulatively considerable contribution to a significant regional air quality impact. As described above, the Project-related construction and operational emissions would be below the

significance thresholds. Therefore, the Project would not be cumulatively considerable, and cumulative impacts would be less-than-significant.

c) **Less-than-Significant Impact with Mitigation.** A HRA was prepared to evaluate potential health risks associated with exposure of TACs including DPM generated by heavy-duty offroad equipment, vehicle idling, and truck traffic, as well as chloroform emissions from the proposed cooling tower and HCL emissions from the proposed scrubber. The HRA was prepared based on the California Office of Environmental Health Hazard Assessment (OEHHA)'s Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA, 2015).

Table 6 displays the estimated health impacts from Project construction. The maximum cancer risk from Project construction emissions would be below the BAAQMD threshold of 10 per million and would be less than significant. The chronic HI would be below the project-level threshold of 1. The Project's unmitigated annual $PM_{2.5}$ concentration from construction activities would be 0.80 µg/m^3 at offsite workers. Thus, the annual $PM_{2.5}$ concentration due to Project construction (combustion exhaust and fugitive dust) would be potentially above the BAAQMD threshold of 0.3 µg/m^3. With **Mitigation Measure AQ-2,** the Project's annual $PM_{2.5}$ concentration from construction activities would be 0.21 µg/m^3 at offsite workers. Thus, the annual $PM_{2.5}$ concentration due to Project construction (combustion exhaust and fugitive dust) would be less than the BAAQMD threshold of 0.3 µg/m^3 with mitigation incorporated.

TABLE 6 ESTIMATED PROJECT CONSTRUCTION HEALTH IMPACTS SUMMARY

Condition	Receptor type	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Project Construction	Residence	0.13	<0.01	<0.01
Unmitigated Project Construction	School	0.01	<0.01	<0.01
Unmitigated Project Construction	Offsite Worker	1.83	0.09	0.80
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	Yes
Mitigated Project Construction	Residence	0.02	<0.01	<0.01
Mitigated Project Construction	Residence	0.02	<0.01	<0.01
Mitigated Project Construction	Offsite Worker	0.24	0.01	0.21
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	No

As shown in **Table 6**, health impacts due to construction activities would not exceed the BAAQMD's thresholds of significance with mitigation. Therefore, Project construction would result in a less-than-significant impact with mitigation.

Mitigation Measure AQ-2: The applicant shall implement the following during construction of the Project:

- All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall utilize diesel engines that are USEPA certified "Tier 4 final" emission standards for particulate matter. Prior to the issuance of any demolition/construction permits, the construction contractor shall submit specifications of the equipment to be used during construction and the city of Pittsburg shall confirm this requirement is met.[7]
- Equipment such as air compressors, concrete/industrial saws, forklifts, light stands, manlifts, pumps, and welders shall be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators.

Table 7 displays the estimated health impacts from Project operation. The maximum cancer risk from Project operation emissions would be below the BAAQMD threshold of 10 per million and would be less than significant. The uncontrolled chronic HI would be above the project-level threshold of 1. However, with stage 1 and 2 for the scrubber, the chronic HI would be below the project-level threshold of 1 and the impact of the Project operation would be less than significant. The annual $PM_{2.5}$ concentration from Project operation would be less than 0.3 $\mu g/m^3$ and less than significant.

TABLE 7 ESTIMATED PROJECT OPERATION HEALTH IMPACTS SUMMARY

Condition	Receptor type	Cancer Risk	Hazard Impact (acute/chronic)	$PM_{2.5}$ Concentration
Project Operation (Uncontrolled)	Residence	<0.01	0.11/<0.01	<0.01
Project Operation (Uncontrolled)	School	<0.01	0.08/<0.01	<0.01
Project Operation (Uncontrolled)	Offsite Worker	0.64	12.5/0.05	0.04
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	Yes	Yes
Project Operation (Stage 1)	Residence	<0.01	<0.01/<0.01	<0.01
Project Operation (Stage 1)	Residence	<0.01	<0.01/<0.01	<0.01
Project Operation (Stage 1)	Offsite Worker	0.64	0.37/<0.01	0.04
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	No
Project Operation (Stage 2)	Residence	<0.01	<0.01/<0.01	<0.01
Project Operation (Stage 2)	School<0.01	<0.01	<0.01/<0.01	<0.01
Project Operation (Stage 2)	Residence	0.64	<0.01/<0.01	0.04
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	No

7 USEPA and CARB have implemented regulations and a tiering system to reduce emissions from off-road equipment with increasing combustion efficiency (i.e., decreasing emissions) where Tier 1 is the least efficient (greatest emissions) and Tier 4 is the most efficient (least emissions). The regulations have been implemented over time such that Tier 1 was phased out in the 1990's and Tier 2 was required, followed by implementation of Tier 3 and Tier 4 by 2015 with a phase out of Tier 2.

As shown in **Table 7**, health impacts due to operations would not exceed the BAAQMD's thresholds of significance. Therefore, the Project would result in a less-than-significant impact.

d) **Less-than-Significant Impact.** Project construction and operations would not generate odors that could adversely affect a substantial number of people. The Project includes an air scrubber to treat process emissions before they are released, and the nearest sensitive receptors are approximately one mile from the Project site. Therefore, the Project would result in a less-than-significant impact.

References

Bay Area Air Quality Management District (BAAQMD). 2023. *CEQA Air Quality Guidelines*. April 2023.

Bay Area Air Quality Management District (BAAQMD). 2014a. Community Air Risk Evaluation Program, Identifying Areas with Cumulative Impacts from Air Pollution in the San Francisco Bay Area, March 2014.

Bay Area Air Quality Management District (BAAQMD). 2014b. *Improving Air Quality & Health in Bay Area Communities, Community Air Risk Program Retrospective & Path Forward (2004 – 2013)*, April 2014.

California Air Pollution Control Officers Association (CAPCOA). 2022. *California Emissions Estimator Model User's Guide.* May 2022. http://www.caleemod.com/. Accessed July 22, 2024.

California Air Resources Board (CARB). *iADAM: Air Quality Data Statistics*. https://www.arb.ca.gov/adam. Accessed July 22, 2024.

BIOLOGICAL RESOURCES

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
4. BIOLOGICAL RESOURCES — Would the proposed 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Introduction

The Project site is within the boundaries of the East Contra Costa County (ECCC) Habitat Conservation Plan/ Natural Community Conservation Plan (HCP/NCCP). The HCP/NCCP is intended to provide an effective framework to protect natural resources in eastern Contra Costa County and the Cities of Brentwood, Clayton, Oakley, and Pittsburg, while improving and streamlining the environmental permitting process for impacts on endangered species. The HCP/NCCP avoids project-by-project permitting that is generally costly and time consuming for applicants and often results in uncoordinated and biologically ineffective mitigation (ECCCHCP Association, 2007).

The Project site is fully developed and consists of existing buildings and pavement, and is surrounded by other industrial lands in the Corteva industrial complex. The Project site is designated as Urban/Developed Land in the HCP/NCCP.

Discussion

a - f) **No Impact.** The Project would not have a substantial adverse effect on wildlife species, riparian habitat or other sensitive natural communities, or state or federally protected wetlands nor would it interfere substantially with the movement of wildlife species because the Project site consists entirely of buildings and pavement within the existing Corteva industrial complex. The Project would not conflict with any local policies or ordinances for protecting biological resources. There are no trees on the Project site, thus there would be no conflict with the City's Tree Preservation and Protection Ordinance (Chapter 18.84, Special Land Use Regulations Applicable to Specific Uses, Article XIX. Tree Preservation and Protection, of the City's Zoning Ordinance). The Project site is fully paved and developed with buildings and is designated as Urban/Developed Land in the HCP/NCCP, thus the Project is not subject to compliance with the HCP/NCCP. Therefore, the Project would result in no impact.

References

ECCCHCP Association, 2007. *Final East Contra Costa County Habitat Conservation Plan/ Natural Community Conservation Plan.* October 2007.

CULTURAL RESOURCES

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
5. CULTURAL RESOURCES — Would the proposed project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Introduction

This section is based on a Cultural Resources Technical Memorandum conducted by Solano Archaeological Services (SAS) in June 2024. The Cultural Resources Technical Memorandum is on file with the City and is confidential due to the potential for releasing the location of potentially sensitive cultural resources.

SAS completed a cultural and paleontological resources investigation of the Project site. The investigation included a records search with the Northwestern Information Center (NWIC) of the California Historical Resources Information System (CHRIS), Sacred Lands File (SLF) search with the Native American Heritage Commission (NAHC), additional archival research focused on historical mapping and land transfer records, and field survey on June 7, 2024.

The records search results indicated that no cultural resources have been previously recorded within the Project site, but three historic-era resources had been documented within one-half mile. The SLF search returned negative results for Native American resources in the Project vicinity. The additional archival research did indicate there are cultural or paleontological resources on the Project site.

The survey noted that the entire Project area was developed and paved with no patches of natural ground surface being exposed. Consequently, no surface traces of prehistoric or historic-era cultural sites, features, or artifacts were documented (SAS, 2024).

Discussion

a) **No Impact.** Archival research and an intensive field survey did not identify any prehistoric cultural resources within the project area (SAS, 2024). The NWIC did note that the Project area was situated within an early 20th century industrial complex (P-07-001086). However, no buildings or structures associated with that development appear to have been built within the Project area. Historic maps and aerial photography reviews suggest that prior to the mid-20th century, no permanent developments of any kind had been built within the Project area. The intense development of the Project area since the 1950s would have entailed significant grading and other construction-related disturbances. Consequently, there is very little chance that any intact and potentially

significant historic-era resources pre-dating the early 20th century could be present within the Project area. Therefore, the Project would result in no impact.

b,c) **Less-than-Significant Impact.** Archival research and an intensive field survey did not identify any significant archaeological or cultural resources within the Project area (SAS, 2024). Historic maps and aerial photography reviews suggest that prior to the mid-20th century, no permanent developments of any kind had been built within the Project area. Historic maps also indicate the Project area is located on or at least immediately adjacent to an old slough or wetland area – a setting often favored by early Native American peoples. However, given the grading and filling that clearly was required to fill in this slough or wetland, it is highly likely that had any intact prehistoric resources been present, they would have been destroyed. SAS concluded that the Project area exhibits a low/moderate level of sensitivity for retaining traces of early Native American activity. The City's 2040 General Plan Policy 10-A-7.k requires all new development, infrastructure, and other ground-disturbing projects to comply with the following conditions in the event of an inadvertent discovery of cultural resources or human remains:

- *If human remains are discovered during any ground disturbing activity, work shall stop until the Development Services Director and the Contra Costa County Coroner have been contacted; if the human remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) and the most likely descendants have been consulted; and work may only resume when measures to relocate or preserve the remains in place, based on the above consultation, have been taken and approved by the Development Services Director.*

- *If archaeological resources are encountered during construction or ground disturbing activity, work within 50 feet of the find shall be halted and a qualified archaeologist meeting the Secretary of Interior's Professional Qualification Standards for archaeology (National Park Service 1983) shall immediately be contacted to evaluate the find pursuant to Public Resources Code Section 21083.2. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for determining California Register of Historical Resources eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work may be warranted, such as data recovery excavation, to mitigate any significant impacts to significant resources. If the resource is of Native American origin, the NAHC shall be contacted to ensure that the Most Likely Descendant can assess the find. Any reports required to document and/or evaluate unanticipated discoveries shall be submitted to the City of Pittsburg for review and approval and submitted to the Northwest Information Center in Sonoma State after completion. Recommendations contained within prepared reports shall be implemented throughout the remainder of ground disturbance activities.*

- *In the event of the identification of cultural resources on a development project site, a professionally qualified archaeologist and Tribal representative shall monitor ground-disturbing construction conducted during project implementation. The monitors shall observe ground-disturbing construction to identify potential archaeological deposits and avoid or limit damage to such deposits. The monitors shall have the discretion to reduce the intensity of monitoring, or suspend such monitoring, if field conditions clearly indicate that no potential intact archaeological deposits could be encountered. Should an intact archaeological deposit be identified, the monitors shall be empowered to temporarily halt construction in the vicinity of the find. The archaeologist shall, in consultation with the Tribal representative and City, evaluate the eligibility of the deposit for inclusion in the California Register of Historical Resources. If the deposit is eligible, the project shall attempt to feasibly avoid damage to the deposit (e.g., redesign or capping). If avoidance is not feasible, the archaeologist shall, in consultation with the Tribal representative and City, develop and implement a plan to recover the scientifically consequential data represented by the deposit in a manner respectful of tribal concerns. A report of the finds of any resource evaluation and/or data recovery efforts shall be submitted to the Northwest Information Center in Sonoma State as a condition for access to its archives.*

The Project would be required to comply with the City's 2040 General Plan Policy 10-A-7.k through the City's Standard Conditions of Approval. Therefore, the Project would result in a less-than-significant impact.

References

Solano Archaeological Services (SAS), 2024. *Cultural Resources Technical Memorandum.* June 11, 2024.

ENERGY

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
6. ENERGY — Would the proposed project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Introduction

Energy resources required for the Project would include electricity and petroleum fuels. These energy resources would be required for facility equipment and vehicles supporting the Project. Energy resources would also be consumed by onsite equipment and vehicles required for construction of the Project.

Setting

The following presents setting information applicable to the Project. Since no buildings would be constructed with the Project, the California Building Energy Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (Title 24, Part 11) are not discussed.

Senate Bill 100

SB 100 mandates that the California Public Utilities Commission (CPUC), California Energy Commission (CEC), and CARB plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero carbon resources by December 31, 2045. SB 100 also updates the state's Renewables Portfolio Standard (RPS) to include the following interim targets:

- 44% of retail sales procured from eligible renewable sources by December 31, 2024.
- 52% of retail sales procured from eligible renewable sources by December 31, 2027.
- 60% of retail sales procured from eligible renewable sources by December 31, 2030.

Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021.

Electricity

Electricity service is provided to the Project site by Pacific Gas & Electric (PG&E). In 2022, statewide electricity generation was 194,320 gigawatt hours (GWh) of electric power. (CEC, 2023a).

Petroleum Fuels

In 2021, California gasoline sales were approximately 11,618 million gallons, and diesel fuel sales were approximately 1,611 million gallons (CEC, 2023b).

Discussion

a) **Less-than-Significant Impact.** The Project would consume energy resources during temporary construction activities and long-term operations.

Temporary Construction Activities

Construction activities are a temporary and one-time direct source of energy consumption. Construction activities would consume petroleum fuels (primarily diesel and gasoline) through the operation of heavy off-road equipment, trucks, and worker automobiles. Electricity could be used for lighting and other equipment such as air compressors, however the amount consumed would be negligible.

Construction fuel usage was estimated using CalEEMod (CAPCOA, 2022). Detailed modeling assumptions and results are provided in **Appendix A**. Project construction was estimated to require approximately 52,000 gallons of petroleum fuels.

Construction of the Project would occur intermittently over approximately 14 months Project construction would utilize fuel efficient equipment and trucks consistent with state regulations and would be consistent with state regulations intended to reduce the inefficient, wasteful, or unnecessary consumption of energy, such as anti-idling and emissions regulations. Furthermore, construction contractors are economically incentivized to employ energy efficient techniques and practices to reduce fuel use to lower overall construction costs.

In light of these statutory and regulatory requirements, the consumption of energy resources during Project construction would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, Project construction would result in a less-than-significant impact.

Long-Term Operations

Long-term energy consumption associated with the Project operations would include electricity and petroleum fuel consumption. Electricity would be consumed by facility equipment. Petroleum fuels would primarily be consumed by vehicles supporting Project operations. Operational energy consumption was estimated using the CalEEMod Version 2022.1.1.14 (CAPCOA, 2022). Detailed modeling assumptions and results are provided in **Appendix A.**

The Project is estimated to consume approximately 14,000 kWh of electricity annually and would not require natural gas consumption. Motor vehicles for Project operations were estimated to consume approximately 36,000 gallons of petroleum fuels.

The electricity delivered by PG&E to the Project would be subject to SB 100 and the state's RPS, which requires increasing renewable energy to 60 percent by 2030 and 100 percent by 2045. PG&E delivers some of the nation's cleanest electricity to customers, with 93 percent from GHG-free resources in 2021. The associated emissions rate is nearly 90 percent cleaner than the latest national average among energy providers (PG&E, 2022).

Petroleum fuels consumed by the Project would decrease over time in accordance with Executive Order N-79-20, which requires all new passenger vehicles sold in California to be zero-emission by 2035, and all other fleets to transition to zero-emission as fully possible by 2045.

While the Project would consume energy resources during operation, the consumption of such resources would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, Project operation would result in a less-than-significant impact.

b) **No Impact.** The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. There are no renewable energy or energy efficiency plans applicable to the Project. Therefore, the Project would result in no impact.

References

California Air Pollution Control Officers Association (CAPCOA). 2022. *California Emissions Estimator Model User's Guide.* May 2022. http://www.caleemod.com/. Accessed June 26, 2024.

California Energy Commission (CEC). 2023a. *Electric Generation Capacity and Energy.* https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/electric-generation-capacity-and-energy. Accessed June 26, 2024.

California Energy Commission (CEC). 2023b. *California Retail Fuel Outlet Annual Reporting Results.* https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed June 26, 2024.

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GEOLOGY AND SOILS

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
7. GEOLOGY AND SOILS — Would the proposed project:				
a) 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?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Introduction

Geologic and Seismic Setting

The Project site is underlain by Quaternary sediments mapped as Pleistocene-age[8] alluvial deposits (USGS, 1979). These sediments contain mostly clay and silt but also include mixtures of sand and gravel in varying degrees of consolidation. However, because the Project site has been developed in an industrial setting for many years, there is a possibility that the native surficial deposits and soils horizons have been disturbed, reworked, or mixed with other soil types or artificial fill during previous construction activity on adjacent parcels.

8 The Pleistocene Epoch spanned from 2.6 million years ago to 11,700 years ago.

The major faults in this region include the active portion of the Concord fault, which has experienced historic displacement in the last 200 years, and the Clayton/Marsh Greenville faults, which have experienced Holocene displacement (within 11,700 years) without historic record. Older (Quaternary and Pre-Quaternary) faults including the Davis fault, Rio Vista fault and Kirby Hills fault; these faults have not experienced displacement within the last 700,000 years. The Concord fault is located about 9 miles to the west-southwest and is the closest fault exhibiting historic displacement (less than 200 years). The Clayton fault is located 6 miles southwest of the Project site. The Davis fault, Kirby Hills fault and Rio Vista faults are located 3, 6, and 10 miles, respectively, from the Project site (CGS, 2023).

Regulatory Framework

Seismic Hazard Mapping Act

The State of California passed the Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code sections 2690–2699) to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events. Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of their project sites have been investigated and appropriate mitigation measures, if any, have been incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under Public Resources Code section 2697, cities and counties must require, prior to the approval of a project located in a seismic hazard zone, submission of a Preliminary Geotechnical Report defining and delineating any seismic hazard.

State publications supporting the requirements of the SHMA include the CGS SP 117A, *Guidelines for Evaluating and Mitigating Seismic Hazards in California*, discussed above, and SP 118, *Recommended Criteria for Delineating Seismic Hazard Zones in California* (2004). SP 117A provides guidelines to assist in the evaluation and mitigation of earthquake-related hazards for projects within designated zones requiring investigations and to promote uniform and effective Statewide implementation of the evaluation and mitigation elements of the SHMA. SP 118 provides recommendations to assist the CGS in carrying out the requirements of the SHMA to produce the Probabilistic Seismic Hazard Maps for the State.

The area of Pittsburg that contains the Project site has been evaluated by the California Geological Survey (CGS) and is zoned as a liquefaction hazard zone under the SHMA. It should be noted that the proposed development of the Project site as an iron salts manufacturing facility is not considered a "Project" as defined under the SHMA. The SHMA defines a "Project" as any

structures for human occupancy[9], or any subdivision of land that contemplates the eventual construction of structures for human occupancy.

California Building Code

The California Building Code (CBC), which is codified in Title 24 of the California Code of Regulations, Part 2, was promulgated to safeguard the public health, safety, and general welfare by establishing minimum standards related to structural strength, means of egress facilities, and general stability of buildings. The purpose of the CBC is to regulate and control the design, construction, quality of materials, use/occupancy, location, and maintenance of all buildings and structures within its jurisdiction. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24 or they are not enforceable. The provisions of the CBC apply to the construction, alteration, movement, replacement, location, and demolition of every building or structure, or any appurtenances connected or attached to such buildings or structures throughout California (DGS, 2020).

The 2022 edition of the CBC is based on the 2021 International Building Code (IBC) published by the International Code Council. The code is updated triennially, and the 2022 edition of the CBC, which was published by the California Building Standards Commission, took effect starting January 1, 2023. The 2022 CBC provides requirements for general structural design and includes means for determining earthquake loads as well as other loads (such as wind loads) for inclusion into building codes. Under the CBC standards, structures should be able to: (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural damage but with some nonstructural damage, and (3) resist major earthquakes without collapse, but with some structural as well as nonstructural damage. Conformance to the current building code recommendations does not constitute any kind of guarantee that substantial structural damage would not occur in the event of a maximum magnitude earthquake. However, it is reasonable to expect that a structure designed in-accordance with the seismic requirements of the CBC should not collapse in a major earthquake (DGS, 2020/2023).

Discussion

a.i,) **No Impact.** Earthquake faults that are delineated under the Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) are typically considered sufficiently active and well-defined and have experienced displacement within Holocene time (about the last 11,000 years). Faults that are zoned under the Alquist-Priolo Act can rupture at the surface during an earthquake causing considerable damage to structures and utilities. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone and is approximately 10 miles from the nearest fault (the Concord fault) capable of causing surface rupture. There are no mapped traces of older faults extending through the Project

[9] A "structure for human occupancy" is any structure used or intended for supporting or sheltering any use or occupancy, which is expected to have a human occupancy rate of more than 2,000 person-hours per year.

site. Therefore, there is no potential for the Project site to experience surface fault rupture from a known mapped earthquake fault and there is no impact.

a.ii) **Less-than-Significant Impact.** Major factors that affect the severity (intensity) of ground shaking include the size (magnitude) of the earthquake, the distance to the fault that generated the earthquake, and the underlying geologic materials. Seismic ground shaking from regional fault zones, including those along the Green Valley, Concord, or Clayton faults, as well as other major faults in the San Francisco Bay Area (namely, the San Andreas fault and the Hayward-Rodgers Creek fault) could affect the Project site. Contra Costa County will likely experience ground shaking from a major regional earthquake during the life of the Project. The 2014 Working Group on California Earthquake Probabilities concluded that there was a 72-percent probability of at least one earthquake of magnitude 6.7 or greater occurring somewhere in the San Francisco Bay region before 2043 (USGS, 2016). There was a 22 percent chance of a magnitude 6.7 earthquake occurring between 2016 and 2043 on the San Andreas fault and a 33 percent chance on the Hayward-Rodgers Creek fault. The probability of a similar event occurring on the Concord/Greenville fault was estimated at 16 percent (USGS, 2016). The likelihood of these earthquakes occurring between 2024 and 2043 is higher than the 2016 estimate because of the passage of time.

The Project site is located in an area characterized by variable subsurface conditions and moderate susceptibility to earthquake damage. In these areas, sound structures on firm dry alluvium typically perform satisfactorily (Contra Costa County, 2005). Ground shaking could cause some structural damage to equipment, older buildings, and above-ground storage tanks, and could possibly injure workers at the Project site. However, CBC requirements are intended to address projected structural response to ground shaking and the corresponding seismic design criteria required for new constructions and renovations ensure that the risk of structural damage or collapse is greatly reduced or eliminated. While earthquake ground shaking would be felt at the Project site, seismic design criteria, as prescribed in the CBC, would reduce the risk of structural collapse and injury to site workers. Although conformance to CBC recommendations do not guarantee that significant structural damage would not occur onsite in the event of a maximum magnitude earthquake, it can be expected that a well-designed and constructed modern structure would not directly or indirectly expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Further, there is no evidence that development of the Project would increase the effects of seismic activity over those felt without the Project. Therefore, this impact would be less than significant.

aiii) **Less-than-Significant Impact.** Liquefaction occurs when saturated sandy or gravelly materials become liquified due to ground shaking during an earthquake. Liquefaction causes a material to lose bearing strength and can result in differential settlement and consolidation, which, in turn, can damage structures and utilities. The Project site is in a region designated by the SHMA as susceptible to liquefaction and is considered an area of moderate to low liquefaction potential (Contra Costa County, 2005). Zoning under the

SHMA does not necessarily mean that liquefiable materials are confirmed to underlie the site; SHMA zoning identifies areas, based on regional geologic conditions, where there is a potential for liquefaction to occur and soil testing is required to confirm the presence or absence of problematic soils on a particular site. Figure 11-3 of the City's 2040 General Plan also lists the Project site as in a potential liquefaction hazard zone. While there is no information as to the specific characteristics of the alluvium beneath the Project site, given its location, it is likely that it is underlain by unconsolidated clay-sand-silt mixtures. Under these conditions, the potential for liquefaction to occur at the Project site is low.

The design-level geotechnical investigation required by the City of Pittsburg would be conducted prior to final Project design and would include subsurface exploration and testing to determine whether soils beneath the parcel are susceptible to liquefaction. If site investigation indicates a potential for liquefaction, geotechnical remedies would be required to avoid damage to the facilities during an earthquake. Such remedies include ground improvement techniques (e.g., dynamic compaction jet grouting, lime stabilization) or placement of foundation piers that extend into competent materials below liquefiable material. Geotechnical methods to reduce hazards from liquefaction are standard, industry-accepted solutions used throughout the San Francisco Bay Area to remedy liquefiable soil conditions. The City of Pittsburg requires projects to implement the recommendations and geotechnical remedies outlined in the required design-level geotechnical investigation. The potential for liquefaction damage at the Project site, if determined a potential hazard, would be greatly reduced through standard geotechnical remedies and therefore, this impact would be less than significant.

ai.v) **No Impact**. The Project site topography has very low relief and no sloping land; thus, there is no potential for landslides and/or slope failures and thus, there is no impact.

b) **Less-than-Significant Impact.** The Project site is paved with asphaltic/concrete and is covered in sections by industrial buildings. Short-term erosion of surface soils or temporary soil stockpiles is possible during the construction phase of the Project when and if asphalt is removed and the underlying soil is disturbed and exposed to precipitation. However, under the Construction General Permit (CGP) (discussed in detail in the Hydrology and Water Quality section), the permit applicant or their contractor(s) would implement stormwater controls [(aka Best Management Practices (BMPs)], as set forth in a detailed Stormwater Pollution Prevention Plan (SWPPP). SWPPPs must describe the specific erosion control and stormwater quality BMPs needed to reduce erosion and minimize pollutants in stormwater runoff with adequate details of their placement and proper installation. Under the CGP, there is a low potential that the Project site would be impacted by a substantial degree of erosion during construction. Post-construction, the Project site would be occupied by industrial equipment and pavement, which would not leave soil exposed to erosion. The potential for temporary and long-term erosion to occur at the site is low; therefore, this impact would be less than significant.

c) **Less-than-Significant Impact.** The proposed Project would redevelop a parcel in an industrial area with chemical manufacturing equipment and appurtenances. Based on current site conditions, the soils beneath the parcel appear to be competent materials consisting of clay and silt mixtures. These materials are not considered unstable (i.e., susceptible to settlement, subsidence, or soils collapse), although, as discussed in Topic a.(iii), this area of Pittsburg is zoned under the SHMA as susceptible to liquefaction. As discussed above, this does not necessarily mean that the Project site is underlain by liquefiable material, but rather represents conditions in the Project area. Given that the previously developed facilities adjacent to the Project site have performed well without experiencing settlement or ground failure, it is very likely that the proposed Project development would remain stable following construction. A design-level geotechnical investigation, which is required by the City of Pittsburg, would be conducted to determine final foundation design for the manufacturing equipment and truck parking areas. The investigation would include subsurface soil exploration and testing and if problematic soils are identified, geotechnical corrective measures would be recommended. These measures are standard, industry-accepted solutions used throughout the San Francisco Bay Area to remedy problematic soil conditions. The City of Pittsburg requires projects to implement the recommendations and geotechnical remedies outlined in the required design-level geotechnical investigation. As discussed in Topic a.(iv), the Project site is relatively flat so the potential for lateral spreading or on- or offsite landsliding are not considered a potential Project impact. Therefore, this is a less-than-significant impact.

d) Less-than-Significant Impact. Soils beneath the Project parcel could be expansive, exhibiting shrink-swell characteristics.[10] The cyclic shrink-swell nature of expansive soils can, over time, damage foundations and pavement surfaces. However, the design-level geotechnical investigation completed prior to construction, which is required by the City of Pittsburg and necessary to design equipment foundations, would test near-surface soil and if expansive soils are identified, recommendations would be provided to address and remedy areas with problematic soils. Remedies for expansive soils typically involve removal and replacement with soils with non-expansive soils. The City of Pittsburg requires projects to implement the recommendations and geotechnical remedies outlined in the required design-level geotechnical investigation. Therefore, this impact would be less-than-significant impact.

e) **No Impact.** An Onsite Wastewater Treatment System (OWTS) is not proposed as part of the proposed Project. Domestic sewage and wastewater would be conveyed from the existing facility to the municipal sewage system. There is no impact.

f) **Less-than-Significant Impact.** The Project site is underlain by Quaternary alluvial deposits consisting of clay, silt, sand, and gravel. These comparatively young unconsolidated to semi-consolidated deposits do not typically contain intact fossilized remains. A review of the University of California Museum of Paleontology (UCMP)

10 Expansive soils shrink when desiccated and swell or expand with the addition of moisture.

localities database revealed that paleontological resources in Contra Costa County were recovered in the older (e.g., Tertiary-age) formations and not within the much younger Quaternary and Pleistocene alluvium (UCMP, 2023). Geologically young and unconsolidated alluvium deposits rarely, if ever, contain fossilized remains. Given the young age and the nature of the alluvial materials, there is a low probability that the shallow construction excavations necessary during Project construction would encounter fossilized remains. In addition, this site is currently a flat-lying vacant lot and does not contain a unique geologic feature. Therefore, this impact is less than significant.

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GREENHOUSE GAS EMISSIONS

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
8. GREENHOUSE GAS EMISSIONS — Would the proposed project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Introduction

Greenhouse gas emissions (GHG) emissions would be generated during Project operations from the consumption of electricity and petroleum fuels. GHG emissions would also be temporarily generated by onsite equipment and vehicles required for construction of the Project.

Setting

Global Climate Change and GHG Emissions

Over the last 10,000 years, the rate of temperature change has typically been incremental, with warming and cooling occurring over the course of thousands of years. However, scientists have observed an unprecedented increase in the rate of warming over the past 150 years, roughly coinciding with the global industrial revolution, which has resulted in substantial increases in GHG emissions into the atmosphere. The anticipated impacts of climate change in California range from water shortages to inundation from sea level rise. Transportation systems contribute to climate change primarily through the emissions of certain GHGs (CO_2, methane (CH_4), and nitrous oxide (N_2O)) from nonrenewable energy (primarily gasoline and diesel fuels) used to operate passenger, commercial and transit vehicles. Land use changes contribute to climate change through construction and operational use of electricity and natural gas, and waste production.

The Intergovernmental Panel on Climate Change (IPCC) has reached consensus that human-caused emissions of GHGs in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. It is "extremely likely" that more than half of the observed increases in global average surface temperature from 1951 to 2010 were caused by the anthropogenic increase in GHG concentrations and other anthropogenic forces together. The IPCC predicts that the global mean surface temperature increase by the end of the 21st century (2081– 2100) relative to 1986–2005, could range from 0.5 to 8.7 degrees Fahrenheit. Additionally, the IPCC projects that global mean sea level rise will continue during the 21st century, very likely at a faster rate than observed from 1971 to 2010. For the period 2081–2100 relative to 1986–2005, the rise will likely range from 10 to 32 inches (IPCC, 2013).

Greenhouse Gases

Gases that trap heat in the atmosphere are referred to as GHGs because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHGs has been implicated as the driving force for global climate change. The six primary GHGs are:

- carbon dioxide (CO_2), emitted when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned;
- methane (CH_4), produced through the anaerobic decomposition of waste in landfills, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, incomplete fossil fuel combustion, and water and wastewater treatment;
- nitrous oxide (N_2O), typically generated as a result of soil cultivation practices, particularly the use of commercial and organic fertilizers, fossil fuel combustion, nitric acid production, and biomass burning;
- hydrofluorocarbons (HFCs), primarily used as refrigerants;
- perfluorocarbons (PFCs), originally introduced as alternatives to ozone depleting substances and typically emitted as by-products of industrial and manufacturing processes; and
- sulfur hexafluoride (SF_6), primarily used in electrical transmission and distribution.

Although there are other contributors to global climate change, these six GHGs are identified by the U.S. Environmental Protection Agency (U.S. EPA) as threatening the public health and welfare of current and future generations. GHGs have varying potential to trap heat in the atmosphere, known as global warming potential (GWP), and atmospheric lifetimes. GWP reflects how long GHGs remain in the atmosphere, on average, and how intensely they absorb energy. Gases with a higher GWP absorb more energy per pound than gases with a lower GWP, and thus contribute more to warming Earth. For example, one ton of CH_4 has the same contribution to the greenhouse effect as approximately 28 tons of CO_2; hence, CH_4 has a 100-year GWP of 28 while CO_2 has a GWP of 1. GWP ranges from 1 (for CO_2) to 23,500 (for SF_6).

In emissions inventories, GHG emissions are typically reported in terms metric tons of CO_2 equivalents (CO_2e). CO_2e are calculated as the product of the mass emitted of a given GHG and its specific GWP. While CH_4 and N_2O have much higher GWP than CO_2, CO_2 is emitted in such vastly higher quantities that it accounts for the majority of GHG emissions in CO_2e.

Regional GHG Emissions Estimates

In 2020, California emitted approximately 369.2 million metric tons of CO_2e. This represents approximately six percent of total U.S. emissions. This large number is due primarily to the sheer size of California compared to other states. California's gross emissions of GHG decreased by 5.6 percent from 461.9 million metric tons of CO_2e in 2000 to 369.2 million metric tons in 2020, with a maximum of 486.2 million metric tons in 2004 (CARB, 2022).

In 2016, overall community wide GHG emissions for City of Pittsburg was 428,563 metric tons of CO_2e. The largest proportion of GHG emissions in the City in 2016 came from natural gas usage in residential and non-residential buildings, followed by on-road transportation, off-road vehicles and equipment, electricity usage in residential and non-residential buildings, and solid waste (landfilling). Minor sources also included electricity transmission and distribution losses, water and wastewater collection and treatment, BART passenger rail, and marine transit. The total GHG emissions for 2016 indicates a decrease of 42,652 metric tons of CO_2e or an approximately nine percent decrease from the adjusted 2005 community wide GHG emissions of 471,215 metric tons of CO_2e (City of Pittsburg, 2019).

Executive Order S-3-05

Governor Schwarzenegger established Executive Order S-3-05 in 2005, in recognition of California's vulnerability to the effects of climate change. Executive Order S-3-05 set forth a series of target dates by which statewide emissions of GHG would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The executive order directed the Secretary of the California EPA (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary will also submit biannual reports to the governor and California Legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with the executive order, the secretary of CalEPA created the California Climate Action Team, made up of members from various state agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of California businesses, local governments, and communities and through state incentive and regulatory programs.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 required that statewide GHG emissions be reduced to 1990 levels by 2020.

AB 32 required CARB to adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrived at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state reduces GHG emissions enough to meet the cap. AB 32 also included guidance on instituting emissions reductions in an economically efficient manner, along with conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

Climate Change Scoping Plan

AB 32 required CARB to develop a Scoping Plan that describes the approach California will take to reduce GHG to achieve the goal of reducing emissions to 1990 levels by 2020. CARB's *2022 Scoping Plan* was adopted in December 2022. The three previous scoping plans focused on specific GHG reduction targets for the state's industrial, energy, and transportation sectors — first to meet 1990 levels by 2020, then to meet the more aggressive target of 40 percent below 1990 levels by 2030. The *2022 Scoping Plan* addresses recent legislation and direction from Governor Newsom, extending and expanding upon earlier scoping plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045.

Low Carbon Fuel Standard

Under the Climate Change Scoping Plan, the CARB identified the LCFS as one of the nine discrete early action measures to reduce California's GHG emissions. The LCFS is designed to decrease the carbon intensity of California's transportation fuel pool and provide an increasing range of low-carbon and renewable alternatives, which reduce petroleum dependency and achieve air quality benefits.

In 2018, the CARB approved amendments to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector.

Executive Order No. B-30-15

On April 29, 2015, Executive Order No. B-30-15 was issued to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. Executive Order No. B-30-15 sets a new, interim, 2030 reduction goal intended to provide a smooth transition to the existing ultimate 2050 reduction goal set by Executive Order No. S-3-05. The Executive Order also states that "CARB shall update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent."

Senate Bill 32

On September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, extending AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged).

Senate Bill 100

SB 100 mandates that the CPUC, CEC, and CARB plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero carbon resources by December 31, 2045. SB 100 also updates the state's RPS to include the following interim targets:

- 44% of retail sales procured from eligible renewable sources by December 31, 2024.

- 52% of retail sales procured from eligible renewable sources by December 31, 2027.
- 60% of retail sales procured from eligible renewable sources by December 31, 2030.

Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021.

Executive Order B-55-18

On September 10, 2018, the governor issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

Significance Criteria

Because the issue of global climate change is inherently a cumulative issue, the contribution of Project-related GHG emissions to climate change is addressed as a cumulative impact. Some counties, cities, and air districts have developed guidance and thresholds for determining the significance of GHG emissions that occur within their jurisdiction. The City of Pittsburg is the CEQA lead agency for the Project and is, therefore, responsible for determining whether GHG emissions with the Project would have a cumulatively considerable contribution to climate change. The City of Pittsburg has not adopted GHG emissions significance thresholds, thus defers to BAAQMD's adopted thresholds.

BAAQMD recently updated their *CEQA Air Quality Guidelines* (BAAQMD, 2023). BAAQMD's thresholds of significance consist of three options for project-level impacts:

a. Land use project design elements that must be included in a project,

b. Consistency with a local GHG reduction strategy, and

c. A stationary source threshold of 10,000 metric tons of CO_2e per year.

BAAQMD's *CEQA Air Quality Guidelines*, *Appendix B: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans*, state the following in reference to the newly adopted land use project design elements significance thresholds:

> *"The Air District has developed these thresholds of significance based on typical residential and commercial land use projects and typical long-term communitywide planning documents such as general plans and similar long-range development plans. As such, these thresholds may not be appropriate for other types of projects that do not fit into the mold of a typical residential or commercial project or general plan update. Lead agencies should keep this point in mind when evaluating other types of projects. A lead agency does not necessarily need to use a threshold of significance if the analysis and justifications that were used to develop the threshold do not reflect the particular*

circumstances of the project under review. Accordingly, a lead agency should not use these thresholds if it is faced with a unique or unusual project for which the analyses supporting the thresholds as described in this report do not squarely apply. In such cases, the lead agency should develop an alternative approach that would be more appropriate for the particular project before it, considering all of the facts and circumstances of the project on a case-by-case basis."

The proposed Project is not a typical land residential or commercial land use project, as it is an industrial facility expansion that would not construct new buildings or vehicle parking. Thus, the land use project design elements significance threshold does not apply. Furthermore, the City of Pittsburg has not adopted a local GHG reduction strategy or climate action plan, thus, that significance threshold is not applicable either.

Therefore, this analysis uses the 10,000 metric tons of CO_2e per year significance threshold to assess potential GHG emissions impacts from the Project. Project emissions less than 10,000 metric tons of CO_2e per year would indicate that the proposed Project's contribution to global climate change would be less than cumulatively considerable.

Discussion

a) **Less-than-Significant Impact.** The Project would generate GHG emissions during temporary construction activities and long-term operations.

Temporary Construction Activities

Construction activities are a temporary and one-time direct source of GHG emissions. Construction activities would generate GHG emissions through the operation of heavy off-road equipment, trucks, and worker automobiles. Construction of the Project would occur intermittently over approximately 14 months from May 2025 through July 2026. Construction of the Project would utilize fuel efficient equipment and trucks consistent with state regulations and would be consistent with state regulations intended to reduce the inefficient, wasteful, or unnecessary consumption of energy, such as anti-idling and emissions regulations.

Construction emissions were estimated using CalEEMod (CAPCOA, 2022). Detailed modeling assumptions and results are provided in **Appendix A**. Project construction was estimated to generate approximately 495 metric tons of CO_2e during Project construction (282 metric tons of CO_2e in 2025 and 213 metric tons of CO_2e in 2026). BAAQMD has not adopted GHG emissions thresholds of significance for construction. As noted in BAAQMD's *CEQA Air Quality Guidelines*, *Appendix B,* GHG emissions from construction represent a very small portion of a project's lifetime GHG emissions and operational emissions represent the vast majority of project GHG emissions. Construction emissions would not result in a significant impact on the environment. Therefore, Project construction would result in a less-than-significant impact.

Long-Term Operations

Long-term operational GHG emissions would be generated primarily by mobile sources (i.e., employee vehicles and heavy trucks). GHG emissions would also be generated through on-site mobile equipment use, energy use, water/wastewater conveyance, and solid waste disposal. Operational GHG emissions were estimated using CalEEMod (CAPCOA, 2022) and are displayed below in **Table 8** below. Detailed modeling assumptions and results are provided in **Appendix A.**

TABLE 8 ESTIMATED PROJECT ANNUAL OPERATIONAL GHG EMISSIONS

Year	Mobile Emissions	Scrubber	On-Site Equipment	Water/ Wastewater	Solid Waste Disposal	Electricity Usage	Total Emissions
2027	362.0	141.0	16.1	10.3	1.9	1.3	**533**
Threshold of Significance							**10,000**
Potentially Significant?							No

NOTES:

1 Metric tons of CO_2e

SOURCE: CAPCOA, 2022.

As shown above in **Table 8**, the Project would generate a maximum of approximately 533 metric tons of CO_2e in year 2027, below the significance threshold of 10,000 metric tons of CO_2e per year. Therefore, the Project would result in a less-than-significant impact.

b) **Less-than-Significant Impact.** The City of Pittsburg has not adopted a local GHG reduction strategy or climate action Plan. State plans for reducing GHG emissions include CARB's 2017 Scoping Plan for achieving the 2030 GHG emissions reduction target outlined in SB 32 (40 percent below 1990 levels by 2030) and CARB's 2022 Scoping Plan for achieving carbon neutrality by 2045 and 85 percent below 1990 levels. CARB's scoping plans rely on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies, such as SB 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 60 percent by 2030 and 100 percent by 2045.

The electricity delivered by PG&E and consumed by the Project would be subject to SB 100 and the state's RPS, which requires increasing renewable energy to 60 percent by 2030 and 100 percent by 2045. PG&E delivers some of the nation's cleanest electricity to customers, with 93 percent from GHG-free resources in 2021. The associated emissions rate is nearly 90 percent cleaner than the latest national average among energy providers (PG&E, 2022).

Petroleum fuels consumed by the Project would decrease over time in accordance with Executive Order N-79-20, which requires all new passenger vehicles sold in California to be zero-emission by 2035, and all other fleets to transition to zero-emission as fully possible by 2045.

As noted in impact a), the Project would be below BAAQMD's adopted GHG significance thresholds. The Project would not conflict with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions. Therefore, the Project would result in a less-than-significant impact.

References

California Air Pollution Control Officers Association (CAPCOA). 2022. *California Emissions Estimator Model User's Guide.* May 2022. http://www.caleemod.com/. Accessed July 10, 2023.

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U.S. Environmental Protection Agency (U.S. EPA). 2021. *Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2019*. April 2021.

HAZARDS AND HAZARDOUS MATERIALS

Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
9.	**HAZARDS AND HAZARDOUS MATERIALS — Would the proposed project:**				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Setting

The Project would occupy a 1.38-acre industrial parcel (Project site) within Corteva's larger developed industrial facility. The Project site is relatively flat, fully developed with existing buildings, and is paved with impervious surfaces.

The Corteva industrial complex contains active chemical manufacturing facilities, an active Class II (designated waste) landfill with several closed solid-waste disposal units. Groundwater contamination has been identified in the shallow aquifers beneath the Corteva facility. Pursuant to their approved 1999 revised corrective action plan with the Regional Water Quality Control Board (RWQCB), Corteva has operated an on-site Enhanced In-Situ Bioremediation (EISB) system for groundwater remediation since March 2000. The closest non-industrial area to the Project site is located over 1 mile to the south and southwest and include Los Medanos Community College and developed residential areas containing several schools, a day care center for children, a nursing home, and a public park.

Regulatory Setting

The California Department of Toxic Substances Control (DTSC) defines a hazardous material as: "a substance or combination of substances that, because of its quantity, concentration or physical, chemical, or infectious characteristics, may either: 1) cause, or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating illness; or 2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, disposed of, or otherwise managed." Hazardous materials are generally classified based on the presence of one or more of the following four properties: toxicity, ignitability, corrosivity and reactivity. The compounds used in the proposed operation, as described above, are considered moderately to highly corrosive. Regulations governing the use, management, handling, transportation and disposal of hazardous materials and waste are administered by several federal, state and local governmental agencies. Federal regulations governing hazardous materials and waste include the Resource Conservation, and Recovery Act of 1976 (RCRA); the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA); and the Superfund Amendments and Re-authorization Act of 1986 (SARA). Federal statute 49 CFR regulates shipment of hazardous materials by ground, air, and vessel. The Department of Transportation (DOT), which includes the Federal Motor Carrier Safety Administration (FMCSA), is responsible for enforcing 49 CFR. In California, other agencies involved with the regulation and enforcement involving hazardous materials use, storage and shipment include the DTSC, California Division of Occupational Safety and Health (DOSH or Cal/OSHA), California Department of Motor Vehicles (DMV), and the California Highway Patrol (CHP). The Certified Unified Program Agency (CUPA) consolidates and coordinates programs for hazardous waste, Hazardous Materials Business Plans (HMBPs), the California Environmental Protection Agency (CalEPA's) California Accidental Release Prevention (CalARP) program, and Uniform Fire Code, among others. The Contra Costa Health Services Hazardous Materials Programs (CCHSHMP) is the CUPA for the City of Pittsburg.

The proposed Project facility would be required by CalEPA to prepare and submit an HMBP for storage of hazardous materials when quantities exceed State-defined thresholds (55 gallons of a liquid, 200 cubic feet of a gas, and 500 pounds of a solid). The HMBP consists of owner/operator information including: i) a list of emergency contacts; ii) developing a hazardous material inventory, which includes listing physical state, quantities, known hazards, and the identity of each chemical component; iii) submitting of a facility map, which provides the location of each hazardous material within the facility, the location of emergency equipment and emergency evacuation areas, and locations of environmentally sensitive areas such as storm drains, sewer system inlets, etc.; iv) developing a business emergency plan, which lists all local, State and federal emergency contacts and provides information on emergency equipment and procedures; and v) providing an employee training plan, which specifies how employees will would be trained relative to routine hazardous material handling and non-routine and emergency situations. The HMBP is submitted and updated annually through CalEPA's web-based California Environmental Reporting System (CERS). Each CERS submission is reviewed and approved by the local CUPA, who also inspects each hazardous material handler on a periodic basis.

The CUPA also oversees the State's CalARP program, which requires preparation of a risk management plan (RMP) for facilities with regulated substances above threshold quantities within a process. The CalARP program requires developing an offsite consequences analysis (OCA) based on a worst-case release scenario for each threshold chemical. Based on the OCA and several other factors, the facility is placed into one of four program levels, which require implementing specified protocols for chemical hazard analysis and developing various management plans for routine and non-routine situations involving the chemical.

Hazardous materials include hazardous wastes. Hazardous waste management in California is regulated overall by Cal/EPA's Department of Toxic Substances Control (DTSC), and at the local level by the CUPAs. Facilities that generate hazardous waste must obtain a hazardous waste generator ID number and must follow extensive requirements found in Title 22 of the California Code of Regulations. These requirements include waste characterization, accumulation requirements, transportation, employee training and recordkeeping and reporting.

Section 65962.5 of the Government Code requires Cal/EPA to develop and update a list of hazardous waste and substances sites, known as the Hazardous Waste and Substance Sites (Cortese) List, which is maintained by the DTSC. The Cortese List is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. The Cortese List includes hazardous substance release sites identified by the DTSC, the State Water Resources Control Board (SWRCB), and the California Department of Resources Recycling and Recovery (CalRecycle).

Discussion

a) **Less-than-Significant Impact.** During construction of the Project, the use of materials considered to be hazardous substances would be limited to consumer quantities of fuels, lubricants, adhesives, and solvents, that are subject to standard manufacturer handling and storage recommendations and Cal/OSHA management and disposal requirements, where applicable. Thus, the potential for the release of hazardous materials associated with construction would be low and not considered a significant hazard to the public or the environment.

The Project would require demolition of 27,000 square feet of existing pavement and excavation and offsite removal of 16,000 cubic yards of soil. Because the Project site has been within a larger industrial facility for many years, there is a potential that soils underlying the pavement slated for removal could be impacted with residual concentrations of contaminants including hydrocarbons, metals, or pesticides. Groundwater would likely not be encountered during soil excavation. Public records indicate that the Project parcel is not currently or has in the past been subject to investigation for contaminated soil or groundwater (DTSC, SWRCB, 2024). However, because there is a potential to discover unanticipated soil contamination during grading, excavation and soil removal, the Project would implement a Soils Management Plan (SMP). The SMP would outline the procedures contractors are to follow if unanticipated soil contamination is encountered during construction grading and excavation activities.

The SMP would specify protocols and notifications necessary to address discovery of contaminated soil, health and safety, sampling and analysis, monitoring, soil removal, stockpiling, water quality, and transportation.

The potential for the release of hazardous substances associated with construction is low because of the small, controllable quantities used and the temporary, site-specific nature of construction activities. The SMP would further reduce the potential hazards of exposed contaminated soil during construction grading and excavation. Thus, the potential for Project construction to create a significant hazard to the public is low and the impact is less than significant.

The Project would manufacture iron salts, which requires transporting, processing, and storing several corrosive chemicals. These chemical compounds (except for liquid oxygen and Ferric Sulfate Oxidizer) are contained in the California Occupational Safety and Health Regulations (CAL/OSHA) Hazardous Substance List,[11] and include:

- Ferrous Chloride (CAS[12] No. 7758943) (aka iron salts) serves as a coagulation and flocculation agent in wastewater treatment, especially for wastes containing chromate or sulfides. It is used for odor control in wastewater treatment. Ferrous chloride is corrosive.

- Sodium Hydroxide (CAS No. 1310732) (aka. caustic soda or lye) is a white, odorless solid commonly used in cleaners and soaps. It can react violently with strong acids and with water and is corrosive.

- Sulfuric Acid (CAS No. 7664939) is a colorless oily liquid, which is soluble in water with the release of heat. It is highly corrosive to metals and human tissue.

- Ferric Sulfate (CAS 10028225) is used for aluminum etching, soil conditioning, a polymerization catalyst, a dye fixative, and as a hemostatic agent in dentistry. Ferric sulfate is used in water treatment and is corrosive to many metals

- Hydrogen Chloride (CAS No. 7647010) is a colorless to slightly yellow, corrosive, nonflammable gas that is heavier than air and has a strong, irritating odor.

- Chlorine (CAS No. 7782505) is a poisonous gas with a pungent odor like bleach. It is a hazardous, highly corrosive chemical that is heavier than air.

11 Chapter 3.2. California Occupational Safety and Health Regulations (CAL/OSHA), Subchapter 1. Regulations of the Director of Industrial Relations, Article 5. Hazardous Substances Information and Training, §339.

12 CAS is the Chemical Abstracts Service Number. It is a unique accession number assigned by the Chemical Abstracts Service, a division of the American Chemical Society. Each number is unique to a given compound.

- Ferric Sulfate Oxidizer (CAS not assigned) is produced on a large scale by adding sulfuric acid and an oxidizing agent (e.g., nitric acid or hydrogen peroxide) to a hot solution of ferrous sulfate.

- Liquid Oxygen (CAS not assigned) is used as an oxidant and is widely applied in the metal industries in conjunction with acetylene and other fuel gases for metal cutting, welding, scarfing, hardening, cleaning and melting.

The storage, processing, and transportation of these chemicals is heavily regulated under several local, state, and federal hazardous materials health and safety regulations to ensure that risks to the public or the environment from hazardous materials and wastes are minimized, as discussed below. In addition, the existing Corteva facility, of which the Project would be a part, is regulated under the CUPA and the CalARP, the processes and storage within the Project site must comply with CalEPA's HMBP regulations, and transportation of hazardous materials and waste must comply with regulations set forth by DOT, DTSC and CalRecycle.

Under regular operation, the Project would accept solid iron ore, scrap steel, and ferrous chloride by truck. These materials would be transported to the facility in accordance with hazardous transportation regulations administered by the US Department of Transportation (DOT). All raw materials and unused process chemicals would be stored in approved, sealed containment and above ground tanks.

Material processing using hydrogen chloride and chlorine to dissolve scrap iron would take place in sealed, specially designed reactors and digesters and the manufactured iron salts would be stored in sealed above-ground tanks. Chlorine and hydrogen chloride used in the processes would be transported onto the site through mostly existing Corteva-owned and operated pipelines. The chlorine pipeline is currently in place 20 feet from the project boundary and would only require an extension of 40 feet to reach the proposed facility. The Corteva facility maintains an RMP under the CalARP Program, which includes RMPs for the release of chlorine vapor and includes the requirement to conduct a process hazard assessment (PHA) in order to identify, evaluate, and control associated hazards.

Hydrogen chloride would be transported to the Project site in DOT regulated tractor trailers specifically designed to transport hazardous corrosive gas. Transportation by truck would continue until a new hydrogen chloride pipeline is completed. The pipeline would extend onto the Project site from the rail depot of F Street to the east. The chlorine and hydrogen chloride pipelines are specially designed with pressure detection controls to convey gas products without the threat of accidental leakage and catastrophic rupture; however, as with the chlorine gas lines, the Corteva facility RMPs would address potential unintended release scenarios of hydrogen chlorine gas and determine appropriate hazardous response protocols to protect workers, the public and the environment.

The finished products, including ferrous chloride, ferric chloride, and ferric sulfate would be transported off the Project site in tanker trucks and rubber-lined rail cars as liquid corrosives, which are regulated by the DOT. In addition to marketable products, the Project would also transport 20 cubic yards per month of nonhazardous filter cake solid material in a dumpster to a regulated landfill under requirement of the DTSC and CalRecycle.

The Project would use and transport various hazardous chemical compounds in solid, gaseous and liquid states for its processes. However, the chemical storage, processing, and transportation of these chemicals is heavily regulated under several local, state, and federal hazardous materials health and safety regulations to ensure that risks to the public or the environment from hazardous materials and wastes are minimized. The Project site is situated within the operating Corteva chemical processing facility, at least one mile from nearby residences and schools. The existing Corteva facility is regulated under the CUPA and the CalARP, the processes and storage within the Project site must comply with CalEPA's HMBP regulations, and transportation of hazardous materials and waste must comply with regulations set forth by DOT, DTSC and CalRecycle. Roads and transportation routes accessing the Corteva site do not intersect residential streets or neighborhoods. Based on its location within an operating and regulated chemical processing facility and the current level of local, state and federal regulations addressing hazardous materials management and waste disposal, the potential for the operation of the proposed Project to create a significant hazard to the public is low and thus this impact is less than significant.

b) **Less-than-Significant Impact.** Refer to topic (a)**,** above. While the Project proposes a manufacturing process that transports, stores, and consumes potentially hazardous chemicals, the current local, state and federal regulatory environment established to control and monitor the use of hazardous materials (i.e., CUPA, CalEPA, DTSC) greatly minimizes the potential for a reasonably foreseeable upset or accident to occur. Considering the modern industry standards for these types of industrial processes and the regulations addressing production, storage, and transportation of hazardous and non-hazardous gas and liquids, an accidental release during use, transportation or conveyance of hazardous materials would be rare. However, if one did occur, it would be managed locally and contained at the Project site by Corteva emergency response teams operating in accordance with federal and state regulations. Thus, the potential for a release of hazardous materials into the environment is low and this impact is less than significant.

c) **Less than Significant.** The closest school to the Project site is Martin Luther King Junior High School, located just over 1 mile to the southwest. The second closest is Los Medanos College located about 1.3 miles to the south. Pittsburg High School is located 1.6 miles to west-southwest. These schools are greater than one mile from the Project site and would not likely be impacted if, in the rare occurrence, a release of either gas phase chlorine or hydrogen chloride, occurred on the Project site. Given the distance from the Project site, the low probability of an accidental release, and the consideration that if an

accidental release did occur, it would be managed and contained judiciously by onsite emergency crews, this impact is considered less than significant.

d) **Less than Significant Impact.** Corteva's property (including the Project parcel) is on the Cortese List due to groundwater contamination issues, and, for that reason, is also listed on SWRCB's GeoTracker and DTSC's EnviroStor sites. EnviroStor indicates that the Corteva facility has three Hazardous Waste Facility Permits: a Boiler and Industrial Furnace Permit, a Block 560 Drum Storage Permit, and a Monofill Post-Closure Permit (DTSC, 2024). Corteva is also listed in Geotracker for a permitted underground storage tank and a Class II (designated waste) landfill. These facilities would not impact operations at the Project site. According to GeoTracker, the site is actively remediating contaminated groundwater for potential contaminants of concern such as benzene, toluene, mercury, and chlorinated hydrocarbons (SWRCB, 2024). Although the entire Corteva facility is the subject of the listing, the leased site for the Project (which is in the interior of the Corteva property) is not expected to be affected by the ongoing remediation activities elsewhere on the larger Corteva property. Construction of the proposed manufacturing facility would not intercept contaminated groundwater, nor will groundwater be used at the Project site. Therefore, this impact is less than significant.

e) **No Impact.** The Project site is not located within an Airport Land Use Compatibility Plan and is not within two miles of a public airport. The nearest airport is the Contra Costa County Airport located approximately 11 miles west of the Project site. Therefore, there is no impact.

f) **Less than Significant.** The Project would not interfere with emergency response plans or evacuation plans. The Project is an industrial in-fill project occurring on a developed lot within an active, private industrial facility. The Project involves the installation of iron salts manufacturing infrastructure on a parcel with existing ingress and egress. The proposed development at the Project site would not establish new access or alter existing access onto the roadways within Corteva property or divert the current traffic flow on surrounding streets. The Project would not impede or require diversion of rescue vehicles or evacuation traffic in the event of a life-threatening emergency. Therefore, this impact is less than significant.

g) **Less-than-Significant Impact.** The Project site is mapped in an unzoned Local Responsibility Area (LRA) and is not located in a State Responsibility Area (SRA) or a Very High Fire Hazard Severity Zone (VHFHSZ). The closest VHFHSZ is approximately 6 miles southwest of the Project site near Clayton (CalFire, 2007). There are no elements of the Project that would exacerbate regional wildland fire risk. Therefore, the impact is less-than-significant impact.

References

California Department of Toxics Substances Control (DTSC). 2024. EnviroStor. Accessed 6/30/24. Online at: https://www.envirostor.dtsc.ca.gov/public/

California State Water Resources Control Board (SWRCB). 2024. GeoTracker. Accessed 6/30/24 Online at: https://geotracker.waterboards.ca.gov/

California Department of Forestry and Fire Protection (CalFire, 2007). *Draft Fire Hazard Severity Zones in LRA* – Contra Costa County. Fire and Resource Assessment Program (FRAP), Version Reviewed: September 17, 2007.

HYDROLOGY AND WATER QUALITY

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
10. HYDROLOGY AND WATER QUALITY – Would the proposed project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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 substantial erosion of 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; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Setting

The Project site is a 1.38-acre parcel within Corteva's larger approximately 200-acre developed industrial complex.[13] The Project site is relatively flat, fully developed and consists of two small buildings and the remainder is paved storage and parking. Annual rainfall is approximately 16.5

13 The total Corteva Agriscience facility consists of approximately 500 acres, about half of which is undeveloped.

inches in the area (Contra Costa County, 2003). The Project site is not located within a 100-year or 500-year flood hazard area (FEMA, 2024).

The Project site is located within the 17.4 square-mile Kirker Creek watershed, which drains much of the City of Pittsburg and a portion of the City of Antioch. The nearest major surface water bodies are Kirker Creek, located approximately 0.4 miles east of the Project site, and New York Slough, located approximately 0.3 miles north of the Project site. Originating in the foothills of Mt. Diablo, Kirker Creek flows north 9.4 miles through parks, ranches, and developed areas in Pittsburg, and empties into New York Slough. The channel of Kirker Creek has been substantially altered in the Project vicinity due to urbanization and the lower reaches of the creek and its tributaries have been culverted, concreted, and redirected in reaches to accommodate residential and industrial uses. While most of the channel is open, culverts divert the creek underground at road crossings and along a few segments near the Pittsburg-Antioch Highway (Contra Costa County, 2003). New York Slough is part of the Sacramento-San Joaquin Delta, which is listed as an impaired water body[14] under Section 303(d) of the Clean Water Act (CWA) (Jacobs, 2019). A Total Maximum Daily Load[15] (TMDL) has been approved for the Sacramento-San Joaquin Delta for mercury, PCBs, and selenium for the Sacramento-San Joaquin Delta (RWQCB, 2024).

All stormwater discharged from the Corteva industrial complex, including the existing Project site, is ultimately discharged to New York Slough in accordance with the General Permit for Stormwater Discharges Associated with Industrial Activities, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS00001 (Industrial General Permit [IGP]). Stormwater currently generated on the Project site flows to the nearest storm drain inlet (there is existing stormwater infrastructure along the eastern edge of the Project site adjacent to F Street and just west of the Project site along the existing internal access road) where it is conveyed via Corteva's stormwater system to a 1.3-million-gallon (MG) concrete retention basin located at the north end of the Corteva industrial complex in the 500 block, adjacent to New York Slough. After development of the Project, stormwater from the first storm event of the wet season, all process water, and stormwater that comes into contact with manufacturing processes would be conveyed to and retained in the concrete retention basin and then treated via the High Purity Water Process system for reuse as raw material for various industrial processes onsite. Stormwater from subsequent storm events that does not come into contact with the manufacturing processes is discharged to New York Slough in accordance with the requirements of the Industrial General Permit. Discharge from the stormwater system can be stopped in the event of a spill of hazardous or polluting material by closing the outfall to New York Slough (Jacobs, 2019).

Within the Corteva industrial facility, each manufacturing or processing area has perimeter diking or is sloped inward toward the process facility as opposed to being sloped toward the adjacent streets. Storage tanks located outside of contained manufacturing or process areas are surrounded

[14] The Sacramento-San Joaquin Delta is listed as an impaired water body for the following pollutants: Chlordane, Dichlorodiphenyltrichloroethane (DDT), Dieldrin, Dioxin compounds (including 2,3,7,8-TCDD), Furan compounds, Mercury, Polychlorinated biphenyls (PCBs), PCBs (dioxin-like), Selenium, invasive species (RWQCB, 2024).

[15] TMDLs are action plans to restore clean water by defining how much of a pollutant a water body can tolerate and meet water quality standards.

by concrete dike walls and the areas inside the dikes have concrete or paved floors to prevent spills from escaping. Stormwater accumulating within these diked areas is not discharged to the storm drain system or to New York Slough; all stormwater collected within the diked areas is processed and recycled for onsite use or is disposed of via an onsite sanitary sewer line to Delta Diablo or transported offsite via tanker truck to an appropriate treatment and/or disposal facility.

Discussion

a) **Less-than-Significant Impact.** During construction activities, stormwater runoff from disturbed soils is a common source of pollutants (mainly sediment) to receiving waters. Earthwork activities can render soils and sediments more susceptible to erosion from stormwater runoff and result in the migration of soil and sediment in stormwater runoff to storm drains and downgradient water bodies. In addition, construction would involve the use of various materials typically associated with construction activities such as paint, solvents, oil and grease, petroleum hydrocarbons, concrete and associated concrete wash-out areas. If improperly handled, these materials could be transported offsite by stormwater runoff (nonpoint source pollution) and degrade receiving water quality.

The US Clean Water Act effectively prohibits discharges of stormwater from construction projects unless the discharge complies with National Pollutant Discharge Elimination System (NPDES) regulations. Because the Project exceeds one acre in size, construction activities would be required to obtain coverage under the State Construction General Permit (CGP)[16]. Under the requirements of the CGP, the permit applicant or their contractor(s) would implement stormwater controls, referred to as construction Best Management Practices (BMPs), as set forth in a detailed Stormwater Pollution Prevention Plan (SWPPP). SWPPPs are a required component of the CGP and must be prepared by a California-certified Qualified SWPPP Developer (QSD) and implemented by a California-certified Qualified SWPPP Practitioner (QSP). SWPPPs must describe the specific erosion control and stormwater quality BMPs that will be implemented to minimize pollutants in stormwater runoff and detail their placement and proper installation. The BMPs are designed to prevent pollutants from contacting stormwater and to keep all products of erosion (i.e., sediment) and stormwater pollutants from migrating offsite into storm drains and receiving waters. Typical BMPs implemented at construction sites include placement of sediment barriers around storm drains, the use of fiber rolls or gravel barriers to detain sediment from disturbed areas, and temporary or permanent stockpile covers to prevent rainfall from contacting the stockpiled material. In addition to erosion control BMPs, SWPPPs also include BMPs for preventing the discharge of other pollutants such as paint, solvents, concrete, and petroleum products to downstream waters. BMPs for these pollutants also include routine leak inspections of equipment, maintaining labelling and inspecting integrity of containers, and ensuring that

[16] NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities – Order no. WQ 2022-0057-DWQ which becomes effective on September 1, 2023 and which supersedes Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and 2012-0006-DWQ.

construction materials are disposed of in accordance with manufacture's recommended disposal practices and applicable hazardous waste regulations.

If shallow groundwater were encountered during construction excavations, temporary dewatering would be necessary to create a dry work area. Any dewatering discharges during construction activities would be required to comply with dewatering requirements specified in the CGP, including that discharge effluent not contain pollutants in quantities that cause pollution or nuisance and that discharges are consistent with water quality standards and limitations for receiving waters. If dewatering were to occur in areas with known soil and/or groundwater contamination (such as sites that have been identified on Geotracker or with local permitting agencies or the RWQCB), dewatering effluent would not discharged to the storm drain system but would be collected and either processed via the High Purity Water Process system or transported offsite to an appropriate facility.

Under the provisions of the CGP, the QSD is responsible for assessing the risk level of a site based on both sediment transport and receiving water risk and developing and implementing the SWPPP. Projects can be characterized as Risk Level 1, 2, or 3, and these risk levels determine the minimum BMPs and monitoring that must be implemented during construction. Under the direction of the QSD, the QSP is required to conduct routine inspections of all BMPs, conduct surface water sampling, when necessary, and report site conditions to the State Water Resources Control Board (SWRCB) using the Stormwater Multi-Application Reporting and Tracking System (SMARTS). Compliance with the CGP is required by law and has proven effective in protecting water quality at construction sites.

Operation of the proposed Project would be subject to coverage under the NPDES Industrial General Permit (General Permit Order 2014-0057-DWQ), which regulates discharges associated with industrial activities. The Industrial General Permit requires the implementation of management measures that will achieve the performance standard of best available technology economically achievable (BAT) and best conventional pollutant control technology (BCT). The Industrial General Permit also requires the implementation of a SWPPP and a monitoring plan with requirements for annual reporting of water quality compliance and any corrective actions implemented. Corteva has implemented a SWPPP and associated monitoring program (Jacobs, 2019) and operation of the Project would be subject to the requirements of that SWPPP. Through the SWPPP, the Industrial General Permit regulates stormwater discharges associated with chemical manufacturing and storage, equipment fueling, maintenance, and waste disposal (as applicable to the proposed Project). In addition, the SWPPP identifies sources of pollutants and describes the means to manage the sources to reduce stormwater pollution.

Required compliance with the CGP and the Industrial General Permit, including implementation of SWPPPs for construction activities and long-term operations, specifying appropriate design features, water quality monitoring, and pollutant source controls, would prevent the discharge of pollutants to surface waters or groundwater and

minimize or eliminate the potential for significant degradation of surface water or groundwater quality from the proposed Project. Water quality impacts would be less than significant.

b) **Less-Than-Significant Impact.** The Project site is located within the Pittsburg Plain Groundwater Basin (DWR, 2004). The City of Pittsburg 2020 Urban Water Management Plan (UWMP) states that the Pittsburg Groundwater Basin is not a critically over-drafted groundwater basin. Groundwater levels in the basin have historically been stable because the majority of local water demand has been met by surface water.

No groundwater wells are proposed as part of the Project and the Project would not involve long-term groundwater extraction. The Project would be served by the existing potable water service provided by the City. The Project site and surrounding industrial use area is currently covered with impervious surfaces. Under the Project, there would not be a substantial change in impervious surfaces such that groundwater recharge is impeded as compared to baseline. Project construction of utilities and foundations would involve subsurface excavation. If shallow groundwater were encountered during construction excavations, temporary dewatering would be necessary to create a dry work area. Dewatering would be localized to the excavation site or trench and would likely only require the removal of low volumes of shallow groundwater from excavation trenches. Because of its short-term and highly localized nature, construction dewatering would not adversely affect local groundwater levels or available supply. The Project would not lower the groundwater table as a result of groundwater extraction or through a reduction in groundwater recharge. Therefore, the Project would not interfere with groundwater recharge or substantially decrease groundwater supplies and impacts related to groundwater depletion and interference with groundwater recharge would be less than significant.

c) **Less-Than-Significant Impact.** Implementation of the proposed Project would not involve the direct alteration of a stream or river and would not substantially alter the existing drainage pattern of the Project site or add impervious surface area as compared to existing conditions. Stormwater runoff during construction and following completion of the Project would not be increased in volume or in regards to peak runoff rates and stormwater would continue to be collected and conveyed via the existing stormwater system for treatment and reuse and/or discharged to New York Slough in compliance with the requirements of the NPDES Industrial General Permit, as occurs under existing conditions. The Project site is not located within a 100-year[17] flood hazard zone designated by the (FEMA); implementation of the Project would not impede or redirect floodwaters offsite.

As described under a), above, during construction of the proposed Project, the applicant would be required to comply with the NPDES regulations and apply for coverage under the CGP because ground disturbance at the Project site would exceed one acre. Under the CGP, the Project applicant or their contractor(s) would be required to prepare and

17 Areas subject to inundation by the 1-percent-annual-chance flood event

implement a SWPPP. The SWPPP must include site-specific erosion and sedimentation control practices and would limit the amount of runoff that may be directed offsite during construction. Following the completion of construction (post-construction), the Project would be subject to compliance with the Industrial General Permit and Corteva's associated SWPPP. The SWPPP requires the identification of sources of pollutants and describes the means to manage the sources to minimize and/or avoid stormwater pollution.

Compliance with NPDES requirements and the implementation of required BMPs would prevent erosion and siltation on- and off-site during construction and would ensure post-construction stormwater discharges would not be increased and that pollutants would not be transported offsite in a manner that would degrade the water quality of receiving waters (i.e., New York Slough). Therefore, impacts related to erosion, siltation, or creating additional sources of polluted runoff would be less than significant.

The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would exceed the capacity of stormwater infrastructure, substantially increase the rate or amount of surface runoff, or impede or redirect flood flows; the impact would be less than significant.

d) **Less-Than-Significant Impact.** A seiche is caused by oscillation of the surface of a large enclosed or semi-enclosed body of water due to an earthquake or large wind event. The Project site is not located near a large enclosed or semi-enclosed body of water. The Project site is not in a tsunami hazard inundation zone (CGS, 2021). As described under c), above, the Project site is not located within a 100-year flood hazard zone designated by FEMA. Therefore, impacts resulting from the release of pollutants due to inundation of the Project due to flood waters would be less than significant.

e) **Less-Than-Significant Impact.** The RWQCB's Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan; RWQCB, 2019) is the principal water quality planning document for the region. The Basin Plan water quality objectives are designed to preserve and enhance water quality and protect the beneficial uses of all regional terrestrial surface water bodies (e.g., creeks, rivers, streams, and lakes) and groundwaters within the RWQCB's jurisdictional area. As discussed above under a), c), and d), the proposed Project would not cause any significant impact related to surface or groundwater quality degradation. The Basin Plan water quality objectives are designed to preserve and enhance water quality and protect the beneficial uses[18] of all regional terrestrial surface water bodies (e.g., creeks, rivers, streams, and lakes) and groundwaters within the RWQCB's jurisdictional area. The Project would comply with the requirements of the NPDES Permit program during construction and operation, including implementation of BMPs and other requirements of a SWPPP, which are designed to ensure stormwater discharges associated with construction and long-term occupancy of the Project site

18 Aquatic resources provide many different benefits. Beneficial uses are those resources, services, and/or qualities of aquatic systems that are to be maintained and are the ultimate goals for protecting and achieving high water quality.

comply with the Basin Plan water quality standards. The Project would not require substantial groundwater withdrawals or reduce groundwater recharge, as discussed under b), and therefore would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts relating to conflict or obstruction of implementing a water quality control plan or sustainable groundwater management plan would be less than significant.

References

California Department of Conservation, California Geological Survey (CGS), 2021. Tsunami Hazard Area Map, Contra Costa County; produced by the California Geological Survey and the California Governor's Office of Emergency Services. Accessed online on June 24, 2024 at: https://www.conservation.ca.gov/cgs/tsunami/maps/contra-costa

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California Department of Water Resources (DWR), 2004. California's Groundwater Bulletin 118, San Francisco Bay Hydrologic Region, Pittsburg Plain Groundwater Basin. February, 2004.

City of Pittsburg, 2020. Urban Water Management Plan (2020 UWMP). Accessed online June 24, 2024 at: https://www.pittsburgca.gov/home/showpublisheddocument/13176/637636628161070000

Federal Emergency Management Agency (FEMA), 2024. National Flood Hazard Layer FIRMette.

Jacobs, 2019. Industrial Stormwater Pollution Prevention Plan, Corteva Agriscience – Pittsburg Operations, 901 Loveridge Road, Pittsburg, California. March, 2019.

Regional Water Quality Control Board San Francisco Bay Region (RWQCB), 2019. San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan). Incorporating all amendments approved by the Office of Administrative Law as of November 5, 2019. Accessed online on June 26, 2024 at: https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/bp_ch1-7_print.html

RWQCB, 2024. Final California 2020 Integrated Report (303(d) List/305(b) Report). Accessed online on June 24, 2024 at: https://www.waterboards.ca.gov/water_issues/programs/tmdl/2020_2022state_ir_reports_revised_final/apx-b/00116.shtml

LAND USE AND LAND USE PLANNING

Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
11.	**LAND USE AND LAND USE PLANNING — Would the proposed project:**				
a)	Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Discussion

a) **No Impact.** The Project site is fully developed and consists of existing buildings and pavement in the Corteva industrial complex. The Project would replace existing Corteva operations that are of similar heavy industrial nature. The Project would not divide an established community. Therefore, the Project would result in no impact.

b) **No Impact.** The Project site is zoned General Industrial (IG) and is designated Industrial in the City's 2040 General Plan. The Project would replace existing Corteva operations that are of similar industrial nature. The Project is consistent with the existing zoning and land designation and would not conflict with any land use plans, policies, or regulations. Therefore, the Project would result in no impact.

MINERAL RESOURCES

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
12. MINERAL RESOURCES — Would the proposed project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion

a, b) **No Impact.** The Project site is fully developed and consists of existing buildings and pavement in the Corteva industrial complex. The Project would replace existing Corteva operations that are of similar heavy industrial nature. The California Department of Conservation Mines Online tool does not identify any documented mines on the Project site (California Department of Conservation, 2024). According to the General Plan, there are currently no significant mineral deposits or active mining operations in the City (City of Pittsburg, 2010). Thus, the Project site does not contain a locally important mineral resource recovery site and the Project would result in no impact.

References

Department of Conservation, *Division of Mine Reclamation, Mines Online.* http://maps.conservation.ca.gov/mol/index.html. Accessed April 11, 2024.

City of Pittsburg. 2010. *City of Pittsburg 2020 General Plan, Chapter 9 Resource Conservation*

NOISE

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
13. NOISE — Would the proposed 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?	☐	☐	☐	☒
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Introduction

Sound is mechanical energy transmitted by pressure waves through a medium such as air. Noise is defined as unwanted sound. Sound pressure level has become the most common descriptor used to characterize the "loudness" of an ambient sound level. Sound pressure level is measured in decibels (dB), with zero dB corresponding roughly to the threshold of human hearing, and 120 to 140 dB corresponding to the threshold of pain. Decibels are measured using different scales, and it has been found that A-weighting of sound levels best reflects the human ear's reduced sensitivity to low frequencies, and correlates well with human perceptions of the annoying aspects of noise. The A-weighted decibel scale (dBA) is cited in most noise criteria. All references to decibels (dB) in this report will be A-weighted unless noted otherwise.

Several time-averaged scales represent noise environments and consequences of human activities. The most commonly used noise descriptors are the equivalent A–weighted sound level over a given time period (Leq)[19]; average day–night 24-hour average sound level (Ldn)[20] with a nighttime increase of 10 dB to account for sensitivity to noise during the nighttime; and community noise equivalent level (CNEL)[21], also a 24-hour average that includes both an evening and a nighttime sensitivity weighting. **Table 9** identifies decibel levels for common sounds heard in the environment. With regard to increases in A-weighted noise level, the following relationships occur (Caltrans, 1998a):

- Under controlled conditions in an acoustics laboratory, the trained healthy human ear is able to discern changes in sound levels of 1 dB;

19 The Equivalent Sound Level (Leq) is a single value of a constant sound level for the same measurement period duration, which has sound energy equal to the time–varying sound energy in the measurement period.

20 Ldn is the day–night average sound level that is equal to the 24-hour A-weighted equivalent sound level with a 10-decibel penalty applied to night between 10:00 p.m. and 7:00 a.m.

21 CNEL is the average A-weighted noise level during a 24-hour day, obtained by addition of 5 decibels in the evening from 7:00 to 10:00 p.m., and an addition of a 10–decibel penalty in the night between 10:00 p.m. and 7:00 a.m.

- Outside of such controlled conditions, the trained ear can detect changes of 2 dB in normal environmental noise;
- It is widely accepted that the average healthy ear, however, can barely perceive noise levels changes of 3 dB;
- A change in level of 5 dB is a readily perceptible increase in noise level; and
- A 10-dB change is recognized as twice as loud as the original source.

TABLE 9 TYPICAL NOISE LEVELS

Noise Level (dB)	Outdoor Activity	Indoor Activity
90+	Gas lawn mower at 3 feet, jet flyover at 1,000 feet	Rock Band
80-90	Diesel truck at 50 feet	Loud television at 3 feet
70-80	Gas lawn mower at 100 feet, noisy urban area	Garbage disposal at 3 feet, vacuum cleaner at 10 feet
60-70	Commercial area	
40-60	Quiet urban daytime, traffic at 300 feet	Large business office, dishwasher next room
20-40	Quiet rural, suburban nighttime	Concert hall (background), library, bedroom at night
10-20		Broadcast / recording studio
0	Lowest threshold of human hearing	Lowest threshold of human hearing

SOURCE: (modified from Caltrans Technical Noise Supplement, 1998)

Noise Attenuation

Stationary point sources of noise, including construction equipment, attenuate (lessen) at a rate of 6 to 7.5 dB per doubling of distance from the source, depending on ground absorption. Soft sites attenuate at 7.5 dB per doubling because they have an absorptive ground surface such as soft dirt, grass, or scattered bushes and trees. Hard sites have reflective surfaces (e.g., parking lots or smooth bodies of water) and therefore have less attenuation (6.0 dB per doubling). A street or roadway with moving vehicles (known as a “line” source), would typically attenuate at a lower rate, approximately 3 to 4.5 dB each time the distance doubles from the source, that also depends on ground absorption (Caltrans, 1998b). Physical barriers located between a noise source and the noise receptor, such as berms or sound walls, would increase the attenuation that occurs by distance alone.

Regulatory Context

Federal and State

There are no federal or state noise standards that regulate noise issues related to the Project.

Local

City of Pittsburg

City of Pittsburg 2040 General Plan

The City of Pittsburg 2040 General Plan Noise Element (Chapter 13) outlines a comprehensive program of achieving acceptable noise levels throughout Pittsburg and ensures compliance with State noise requirements. The Noise Element indicates that the significant sources of noise in Pittsburg include major transportation corridors, such as State Route (SR) 4 and arterial roadways. The following policy is relevant to this Project.

> **Policy 13-P-1.7:** Limit generation of loud noises on construction sites adjacent to existing development to normal business hours between 8:00 a.m. and 5:00 p.m.

City of Pittsburg Municipal Code

The City of Pittsburg has established noise performance standards and permissible hours for construction activities in the Municipal Code. These provisions are summarized below:

> Per §9.44(J), the operation of pile drivers, hammers, and similar equipment is prohibited between the hours of 10:00 p.m. and 7:00 a.m. In addition to these specific requirements set forth in Chapter 9.44 of the Municipal Code, development projects are required to meet the more restrictive standards stated above in Policy 12-P-9, which limits all loud noise-generating construction activities to between 8:00 a.m. and 5:00 p.m.

> Per §18.82.040(B), no construction event or activity occurring on any site adjoining a lot located in an R, residential PD or GQ district shall generate loud noises in excess of 65 decibels measured at the property line, except between the hours of 8:00 a.m. and 5:00 p.m.

Sensitive Receptors

Some land uses are considered more sensitive to ambient noise levels than others due to the amount of noise exposure, in terms of both duration and insulation from noise, and the types of activities typically involved. Residences, hospitals, schools, and nursing homes are generally more sensitive to noise than commercial and industrial land uses. This analysis considers noise-sensitive uses as residences, schools, daycares, hospitals, community centers, and parks consistent with the definitions of noise-sensitive uses in the City of Pittsburg 2040 General Plan Noise Element.

The nearest sensitive receptors are residences approximately one mile southwest of the Project site along Columbia Street. Central Park is approximately one-mile southwest of the Project site. The nearest school, Martin Luther King Jr. Junior High School, is approximately 1.1 miles

southwest of the Project site. There are no churches, hospitals, or community centers within one mile of the Project site.

Existing Noise Environment

The Project site is fully developed and consists of two small buildings and a large area of pavement used for parking and storage, all within in the larger Corteva industrial complex. Major noise sources in the Project vicinity include rail operations to the east, south and west, motor vehicle traffic on the surrounding roadways, and the existing industrial operations within the Corteva industrial complex surrounding the facility.

Discussion

a) ***Construction Noise Impacts***

No Impact. Construction would result in a temporary increase in ambient noise levels in the vicinity of the Project. Construction activities would require the use of numerous pieces of noise-generating equipment, such as excavating machinery (e.g., excavators, loaders, etc.) and other construction equipment (e.g., dozers, compactors, trucks, etc.). The noise levels generated by construction equipment would vary greatly depending upon factors such as the type and specific model of the equipment, the operation being performed, the condition of the equipment, and the prevailing wind direction. The nearest sensitive receptors are residences approximately one mile to the southwest.

Construction noise occurring at the Project site would not be perceptible to sensitive receptors. Certain construction activities would be limited to the allowable hours outlined in City of Pittsburg Municipal Code §9.44(J), described above. Project construction would not exceed standards established in the local general plan or noise ordinance. Therefore, Project construction would result in no impact.

Operational Noise Impacts

The Project would replace existing Corteva operations that are of similar heavy industrial nature. The Project site is in the center of the Corteva industrial complex surrounded by roadways, railways, and industrial uses, thus there are no standards in the General Plan or Noise Ordinance applicable to the Project. Operational noise from the Project would not be perceptible at sensitive receptors. Therefore, Project operations would result in no impact.

b) **No Impact.** The Project site is in the center of the Corteva industrial complex surrounded by roadways, railways, and industrial uses. The Project would utilize the existing buildings on the Project site and would not require building demolition. Construction would utilize typical construction equipment that would not pose potential vibration impacts. Therefore, the Project would result in no impact.

c) **No Impact.** The Project site is not within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public use airport. The nearest airport is Buchanan

Field Airport (the nearest runway of which is approximately 11 miles southwest of the Project site). Therefore, the Project would result in no impact.

References

California Department of Transportation (Caltrans). 1998a. *Technical Noise Supplement*.

California Department of Transportation (Caltrans). 1998b. *Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects.*

City of Pittsburg. 2024. *City of Pittsburg 2040 General Plan, Chapter 13 Noise Element,* April 25, 2024.

POPULATION AND HOUSING

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
14. POPULATION AND HOUSING — Would the proposed project:				
a) 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) Displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a) **No Impact.** The Project site is fully developed with industrial-related uses and consists of existing buildings and pavement in the Corteva industrial complex. Development of the Project would not directly or indirectly induce substantial unplanned population growth in the area. Therefore, the Project would result in no impact.

b) **No Impact.** The Project would not displace existing people or housing units. Therefore, the Project would result in no impact.

PUBLIC SERVICES

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
15. PUBLIC SERVICES — Would the proposed project:				
a) Result in substantial adverse physical impacts associated with the provision of, or the 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 following public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Introduction

Fire Protection

The Contra Costa County Fire Protection District (CCCFPD) provides fire protection services to the City of Pittsburg. The CCCFPD, with 26 fire stations and more than 400 employees, is dedicated to preserving life, property and the environment.[22] The nearest fire station to the site is CCCFPD Station 85, located approximately 1.7 miles to the south on Loveridge Road. CCCFPD Station 84 is located approximately 1.9 miles to the southwest on Railroad Avenue.

Police Protection

The City of Pittsburg Police Department provides law enforcement services to the City. The Pittsburg Police Department is located approximately 2.1 miles west of the Project site.

Discussion

a.i) **Less-than-Significant Impact.** The Project site is an existing developed site with the Corteva industrial complex that is currently served by the CCCFPD. The Project would replace existing Corteva operations that are of similar heavy industrial nature. The Project would not result in an increase in calls for fire and emergency protection services that would warrant changes to fire protection service ratios and/or response times. Therefore, the Project would result in a less-than-significant impact.

a.ii) **Less-than-Significant Impact.** The Project site is an existing developed site with the Corteva industrial complex that is currently served by the Pittsburg Police Department. The Project would replace existing Corteva operations that are of similar heavy industrial nature. The Project is not expected to result in an increase in calls for police protection or

22 Contra Costa County, Fire Protection Districts, Accessed at: https://www.contracosta.ca.gov/1550/Fire-Protection-Districts

result in any changes in crime that would warrant changes to police protection service ratios and/or response times. Therefore, the Project would result in a less-than-significant impact.

a.iii-v) **No Impact.** The Project site is an existing developed site with the Corteva industrial complex. Approximately 25 new employees would work at the facility. These would mostly already be local residents. Therefore, the Project would not warrant a need for new schools, parks, or other public facilities, and would result in no impact.

References

City of Pittsburg. 2010. *City of Pittsburg 2020 General Plan, Chapter 11 Public Facilities.*

RECREATION

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
16. RECREATION — Would the proposed project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

a, b) **No Impact.** There are no recreational facilities within the vicinity of the Project site. The Project would replace existing Corteva operations that are of similar heavy industrial nature. The Project's approximately 25 new employees would not substantially increase the use of existing recreational facilities such that physical deterioration of existing facilities would occur or be accelerated. The Project would not warrant new or expanded recreational facilities. Therefore, the Project would result in no impact.

TRANSPORTATION

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
17. TRANSPORTATION — Would the proposed project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Introduction

Senate Bill 743

Senate Bill 743 (SB 743; Steinberg, 2013) governs the application of new State CEQA *Guidelines* for addressing transportation impacts based on Vehicle Miles Traveled (VMT). It was codified in Public Resources Code §21099, required changes to the guidelines implementing CEQA (State CEQA *Guidelines*) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. The Governor's Office of Planning and Research (OPR) has proposed, and the California Natural Resources Agency (Agency) has certified and adopted, changes to the State CEQA *Guidelines* that identify VMT as the most appropriate metric to evaluate a project's transportation impacts. With the Agency's certification and adoption of the changes to the State CEQA *Guidelines*, automobile delay, as measured by "level of service" and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).)"

The OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR, 2018) provides general direction regarding the methods to be employed and significance criteria to evaluate VMT impacts, absent policies adopted by local agencies.

Project Trip Generation

As noted in the Project Description, the Project site would be accessed via Loveridge Road from Highway 4. Project operations would generate 50 one-way automobile trips per day and 18 one-way heavy truck trips per day (see **Table 10**). The Project would replace existing Corteva operations that are of similar heavy industrial nature, however, to be conservative, existing baseline trips for the Project site were assumed to be zero.

Discussion

a) **Less-than-Significant Impact.** The Project would result in vehicle trips (i.e., worker vehicles, vendor trucks, and haul trucks) during construction. Vehicles associated with construction and operation of the Project would access the Project site via Loveridge Road from Highway 4.

Project operations would generate 50 one-way automobile trips per day and 18 one-way heavy truck trips per day. Trips generated by the Project are shown in **Table 10**, below.

TABLE 10 PROJECT VEHICLE TRIPS

Source	One-Way Trips Per Day	Average One-Way Trip Distance (Miles)	Days Per Year
Incoming Iron Material	6	50	260
Outgoing Finished Product	10	40	260
Outgoing Filter Cake Solids	2	80	12
Operators, Truck Drivers, Managers/Engineers	50	10	260
SOURCE: Pencco, 2024.			

. The Project would not substantially change the pedestrian or bicycle traffic in the area and would not significantly impact or require changes to the design of any existing or planned bicycle or pedestrian facilities. Project construction and operations would not conflict with any program, plan, or policy addressing the circulation system in the City. Therefore, the Project would result in a less-than-significant impact.

b) **Less-than-Significant Impact.** VMT refers to the amount and distance of vehicle travel attributable to a project. VMT generally represents the number of vehicle trips generated by a project multiplied by the average trip length for those trips. For CEQA transportation impact assessment, VMT is calculated using the origin-destination VMT method, which accounts for the full distance of vehicle trips to and from the Project site.

The OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* provides general direction regarding the methods to be employed and significance criteria to evaluate VMT impacts, absent policies adopted by local agencies. The directive addresses several aspects of VMT impact analysis, and is organized as follows:

- **Screening Criteria:** Screening criteria are intended to quickly identify when a project should be expected to cause a less-than-significant VMT impact without conducting a detailed study.

- **Significance Thresholds:** Significance thresholds define what constitutes an acceptable level of VMT and what could be considered a significant level of VMT requiring mitigation.

- **Analysis Methodology:** These are the potential procedures and tools for producing VMT forecasts to use in the VMT impact assessment.

- **Mitigation:** Projects that are found to have a significant VMT impact based on the County's significance thresholds are required to implement mitigation measures to reduce impacts to a less-than-significant level (or to the extent feasible).

Screening Criteria

Screening criteria can be used to quickly identify whether sufficient evidence exists to presume a project would have a less-than-significant VMT impact without conducting a detailed study. However, each project should be evaluated against the evidence supporting that screening criteria to determine if it applies. Projects meeting at least one of the criteria below can be presumed to have a less than significant VMT impact, absent substantial evidence that the project will lead to a significant impact.

The extent to which the Project qualifies under each criterion is noted below.

- **Regional Truck Traffic:** The OPR directive specially focuses on the need to evaluate residential and employment-based travel, either from the standpoint of home-based trips or through evaluation of commute trips associated with employment centers. Consistent with Section 15064.3 of the State CEQA *Guidelines*, impacts from regional truck traffic are not included in the VMT estimates, but are considered from an operational standpoint as they relate to safety.

- **Small Projects:** Defined as a project that generates 110 or fewer average daily vehicle trips.

- **Affordable Housing:** Defined as a project consisting of deed-restricted affordable housing.

- **Local-Serving Non-Residential Development:** The directive notes that local serving retail uses can reduce travel by offering customers more choices in closer proximity. Local serving retail uses of 50,000 square feet or less can be presumed to have a less-than-significant impact.

- **Projects in Low VMT-Generating Area:** Defined as a residential or office project that is in a VMT efficient area based on an available VMT Estimation Tool. The project must be consistent in size and land use type (i.e., density, mix of uses, transit accessibility) as the surrounding built environment.

- **Proximity to High Quality Transit**: The directive notes that employment and residential development located within a half mile of a high-quality transit corridor can be presumed to have a less-than-significant impact.

Impact Conclusion

The extent to which the Project's VMT impacts can be presumed to be less than significant has been determined based on review of the OPR's screening criteria and general guidance. The OPR's Small Project criteria is applicable to the Project. Project

operations would generate 50 one-way automobile trips per day, which is below the OPR's threshold of 110 average daily trips. As the 110 average daily trips threshold would not be exceeded, the Project's VMT impacts can be presumed to be less than significant. Therefore, the Project would result in a less-than-significant impact.

c) **Less-than-Significant Impact.** The Project would not involve any new hazardous design or feature. The Project would not include any sharp curves or dangerous intersection. The Project site design would conform to City design standards and is not expected to create any significant impacts to pedestrians, bicyclists, or traffic operations. Therefore, the Project would result in a less-than-significant impact.

d) **Less-than-Significant Impact.** The Project would not substantially increase hazards to vehicle safety due to increased traffic, which could result in inadequate emergency access. All lane widths within the Project would meet the minimum width that can accommodate an emergency vehicle. In addition, the addition of traffic from Project traffic would not result in any significant changes to emergency vehicle response times in the area. Therefore, the Project would result in a less-than-significant impact.

References

California Governor's Office of Planning and Research (OPR). 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*, April 2018.

TRIBAL CULTURAL RESOURCES

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
18. TRIBAL CULTURAL RESOURCES — **Would the proposed project** cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 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:				
a) 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	☐	☐	☒	☐
b) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	☐	☐	☒	☐

Introduction

Tribal Cultural Resources (TCR's) include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Tribe. To qualify as a TCR, the resource must either: 1) be listed on, or be eligible for, listing on the California Register of Historical Resources (CRHR) or other local historic register; or 2) constitute a resource that the lead agency, at its discretion and supported by substantial evidence, determines should be treated as a TCR (PRC §21074). Under Assembly Bill 52 (AB 52) tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of TCRs within their traditional and cultural affiliated geographic area, and therefore, the identification and analysis of TCRs should involve government-to-government tribal consultation between the CEQA lead agency and interested tribal groups and/or tribal persons. (PRC §21080.3.1(a)).

The City of Pittsburg notified the following tribes in accordance with AB 52 requirements:

1. The Ohlone Indian Tribe
2. Nashville Enterprise Miwok-Maidu-Nishinam Tribe
3. Confederated Villages of Lisjan Nation
4. Chicken Ranch Rancheria of Me-Wuk Indians
5. Guidiville Indian Rancheria
6. Indian Canyon Mutsun Band of Costanoan

7. Muwekma Ohlone Indian Tribe of the SF Bay Area
8. North Valley Yokuts Tribe
9. Amah Mutsun Tribal Band of Mission San Juan Bautista
10. Wilton Rancheria
11. Tule River Indian Tribe

As of November 11, 2024, no tribes have requested formal consultation nor have tribes had specific concerns regarding TCRs that could be present on the Project site and no TCRs were discovered during the cultural resources investigation of the Project site (SAS, 2024).

Discussion

a) **Less-than-Significant Impact.** No cultural resources either listed or eligible for listing by the State or local listing were identified on the Project site as a result of the records search and AB 52 consultation. Therefore, the Project would result in a less-than-significant impact.

b) **Less-than-Significant Impact.** As discussed above, no tribes have had specific concerns regarding TCRs that could be present on the Project site and no TCRs were discovered during the cultural and paleontological resources investigation of the Project site (SAS, 2024). The City's 2040 General Plan Policy 10-A-7.k requires all new development, infrastructure, and other ground-disturbing projects to comply conditions in the event of an inadvertent discovery of cultural resources or human remains (See Cultural Resources Section). Therefore, the Project would result in a less-than-significant impact.

References

Solano Archaeological Services (SAS), 2024. *Cultural Resources Technical Memorandum.* June 11, 2024.

UTILITIES AND SERVICE SYSTEMS

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
19. UTILITIES AND SERVICE SYSTEMS — Would the proposed 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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider that would serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Setting

Water Supply

The City of Pittsburg obtains raw water from the Contra Costa Water District (CCWD), through the Central Valley Project (CVP) from the Delta. CCWD has a contract with the U.S. Bureau of Reclamation (USBR) for 195,000 AF per year (AFY) of CVP water. The current contract was renewed in March 2005 through February 2045. CCWD's future water supply projections indicate adequate availability of surface water sources delivered through its contract with the USBR (City of Pittsburg, 2023). As described below, Delta Diablo also provides 9,600 AFY of for industrial and landscape irrigation uses within the recycled water service area, which includes the City of Pittsburg. CCWD serves as the backup water supply for the major industrial users of recycled water, which use a vast majority of the Delta Diablo recycled water supplies (City of Pittsburg, 2023).

Wastewater

Sewer services in the Planning Area are provided by the City of Pittsburg and the Delta Diablo. The City maintains and owns the local sewage collection system that serves the City's municipal users and the City's wastewater is conveyed to Delta Diablo facilities for treatment. Delta

Diablo's service area encompasses Pittsburg, Bay Point, and Antioch. Delta Diablo owns and operates the collection system that serves the Bay Point community.

Delta Diablo provides wastewater treatment and owns and operates the regional interceptors and the sewage treatment plant located north of the Pittsburg-Antioch Highway. The City's collection system consists of approximately 174 miles of sewer lines ranging in diameter from 6 to 36 inches, and one sewage lift station (City of Pittsburg, 2023). Delta Diablo provides wastewater collection and treatment for the Cities of Pittsburg and Antioch, as well as the unincorporated community of Bay Point. The wastewater treatment plant (WWTP) has an average dry weather flow permitted capacity of 19.5 million gallons per day (MGD) and a recycled water facility (RWF), with a capacity to provide about 9600 AFY, as described in Water Supply, above.

Solid Waste

Mt. Diablo Resource Recovery (MDRR - Pittsburg) formally known as Pittsburg Disposal Service, provides solid waste pick-up and disposal services to Pittsburg. The City's Environmental Services Department, in conjunction with MDRR - Pittsburg, coordinates the curbside recycling, and green waste programs. MDRR - Pittsburg provides separate containers for garbage, recycling and green waste.

Industrial non-recyclable waste is disposed of at the Keller Canyon Landfill, which has a maximum permitted throughput of 3,500 tons per day, and a maximum permitted capacity of 75,018,280 cubic yards with a remaining capacity of 63,408,410 cubic yards. The Landfill is a Class II facility designed to accept mixed municipal, construction/demolition, agricultural, sludge (bio-solids), and other designated industrial solid waste. The total acreage of the landfill property is 1,399 acres, and the allotted disposal footprint is 244 acres. The estimated cease of operation date for this facility is 2050 (City of Pittsburg, 2023).

Discussion

a) **Less-than-Significant Impact.** Water and wastewater treatment, stormwater, telecommunication, and electric power facilities are already provided to, or very close to, the Project site. Natural gas would not be required for the Project. Minor extensions, connections, or relocations of these facilities to serve the proposed Project would comply with all federal, state, and local regulations. Therefore, the Project would result in a less-than-significant impact.

b) **Less-than-Significant Impact.** The Project would connect to the City's domestic water supply and would be expected to use approximately 5.235 million gallons per year. As noted in the setting, the City has adequate water supply and the Project's water demand would not adversely affect the water supply the City obtains from the CCWD. Therefore, the Project would result in a less-than-significant impact.

c) **Less-than-Significant Impact.** All wastewater and rainwater in contact with the manufacturing processes are consumed as raw material. Project-generated wastewater not in contact with the manufacturing process (indoor plumbing for employees) would be

conveyed by the municipal sewer system via existing infrastructure at the Project site. Any generation of wastewater from additional employees would be negligible and would not require additional capacity beyond the wastewater treatment already provided by the City. Therefore, the Project would result in a less-than-significant impact.

d, e) **Less-than-Significant Impact.** Construction and operation of the Project is not expected to generate a significant amount of solid waste. Project operation would generate roughly 120 tons of filter cake and another six tons of miscellaneous solid waste annually. The nonhazardous filter cake would be disposed of at a nearby landfill with existing capacity, likely the nearby Keller Canyon Landfill, but for the purposes of the trip generation and VMT analysis, it was conservatively assumed the filter cake could go to any landfill within 80 miles of the Project site. The Project would comply with all federal, state, and local statutes and regulations related to solid waste. Therefore, the Project would result in a less-than-significant impact.

References

City of Pittsburg. 2023. *Draft Environmental Impact Report for the Pittsburg 2040 General Plan, Update (SCH# 2022040427).* December 2023.

WILDFIRE

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
20. WILDFIRE — If located in or near state responsibility areas or lands classified as very high hazard severity zones, **would the proposed project:**				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Introduction

Areas where the state has financial responsibility for wildland fire protection are known as state responsibility areas (SRA). The Department of Forestry and Fire Protection (CALFIRE) is responsible for fire prevention and suppression in SRA. Areas where local governments have financial responsibility for wildland fire protection are known as local responsibility areas (LRA). The Project site is not located in a SRA or a very high fire hazard severity zone (VHFHSZ). The nearest fire station is CCCFPD Station 85, located approximately 1.7 miles to the south on Loveridge Road. CCCFPD Station 84 is located approximately 1.9 miles to the southwest on Railroad Avenue.

Discussion

a) **No Impact.** The Project site is within an existing developed site with the Corteva industrial complex. The Project would not involve the closure or alteration of any existing evacuation route that would be important in the event of a wildfire. The Project would not impede or require diversion of rescue vehicles or evacuation traffic in the event of a wildfire. Therefore, the Project would result in no impact.

b) **No Impact.** The Project site is an existing developed site with the Corteva industrial complex. There are no elements of the Project that would exacerbate wildland fire risk in the Project area due to slope, prevailing winds, and other factors. Therefore, the Project would result in no impact.

c) **No Impact.** There are no elements of the Project that would exacerbate wildland fire risk in the Project area, which is a developed industrial area. Therefore, the Project would result in no impact.

d) **No Impact.** There are no elements of the Project that would expose future employees or structures to flooding or landslides by runoff flow, post-fire instability, or drainage changes. Therefore, the Project would result in no impact.

References

CALFIRE. 2023. *Fire Hazard Severity Zones in State Responsibility Area,* https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed April 11, 2024.

MANDATORY FINDINGS OF SIGNIFICANCE

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
21. MANDATORY FINDINGS OF SIGNIFICANCE — Would the proposed project:				
a) 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?	☐	☐	☐	☒
b) 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) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

a) **No Impact.** As noted in the Cultural Resources section, the Project would not eliminate important examples of the major periods of California history or prehistory. As noted in the Biological Resources section, no impacts to biological resources would occur. Therefore, the Project would result in no impact.

b) **Less-than-Significant Impact with Mitigation.** According to the City of Pittsburg, there are two proposed industrial projects within one mile of the project site. These include the K2 Pure Chlorine Rail Transport Curtailment Project (approximately ¾ mile northeast of the Project site) and the H Cycle Pittsburg Renewable Hydrogen Project (approximately 1.1 miles northeast of the Project site).

As described in the preceding sections of this Initial Study, the Project would result in no impacts to agricultural and forest resources, biological resources, land use and land use planning, mineral resources, population and housing, recreation, or wildfire. Because the Project would have no impact for these topic areas, there is no potential for the Project to have cumulatively considerable impacts.

As described in the preceding sections of this Initial Study, the Project would result in less than significant impacts to aesthetics, public services, and utility and service systems. The Project is consistent with the land use and zoning designations for the parcel and would not conflict with land use policies or regulations with the required City Use Permit and Design Review, thus aesthetics impacts would be less than significant. Based on the

existing infrastructure and project location within the built out Corteva industrial complex, public services and utilities and service systems impacts would be less than significant. Therefore, there is no potential for the Project to have cumulatively considerable impacts for these topic areas.

As noted in the Air Quality section, the BAAQMD *CEQA Air Quality Guidelines* recommend that cumulative air quality effects from criteria air pollutants also be addressed by comparison to the mass daily and annual thresholds. These thresholds were developed to identify a cumulatively considerable contribution to a significant regional air quality impact. As disclosed in the Air Quality section, the Project-related construction and operational emissions would be below the BAAQMD's mass daily and annual significance thresholds. The incorporation of mitigation measures for fugitive dust and air toxics during construction of the Project would ensure air quality impacts (including health risk) would be less than significant. Therefore, the Project would not result in a cumulatively considerable net increase of emissions of criteria air pollutants and precursors and there is no potential for the Project to have cumulatively considerable air quality impacts.

As noted in the Cultural Resources and Tribal Cultural Resources sections, no historical resources exist on the Project site and the Project area exhibits a low/moderate level of sensitivity for retaining traces of early Native American activity. Due to a lack of identified cultural resources and sensitive landforms, the Project would result in a less-than-significant cultural resources and tribal cultural resources impacts.

As noted in the GHG Emissions section, because the issue of global climate change is inherently a cumulative issue, the contribution of Project-related GHG emissions to climate change is addressed as a cumulative impact and the Project's contribution to global climate change would be less than cumulatively considerable. Energy use and the indirect GHG emissions generated through energy use is also a cumulative issue, as the State adopts regulations to reduce energy use and increase renewable energy in order to improve capacity and reliability, while reducing dependence on fossil fuels in order to reduce GHG emissions. As noted in the Energy section, the Project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, there is no potential for the Project to have cumulatively considerable energy impacts.

Geology and soils impacts are site specific and do not have the potential for cumulative impacts.

As noted in the Hazards and Hazardous Materials section, based on its location within an operating and regulated chemical processing facility and the current level of local, state and federal regulations addressing hazardous materials management and waste disposal, the potential for the proposed Project to create a significant hazard to the public is low and thus this impact is less than significant. Therefore, there is no potential for the Project to have cumulatively considerable hazards or hazardous materials impacts.

As noted in the Hydrology and Water Quality section, required compliance with the prescriptions set forth by the CGP and the Industrial General Permit, including implementation of a SWPPP for construction activities and for long-term operations specifying appropriate design features, water quality monitoring, and pollutant source controls, would prevent the discharge of pollutants to surface waters or groundwater and minimize or eliminate the potential for degradation of surface water or groundwater quality that could result from implementation of the proposed Project. Water quality impacts related to violation of water quality standards or degradation of water quality would be less than significant.

As noted in the Noise section, construction would only occur within the allowable hours outlined in General Plan City of Pittsburg Municipal Code and Project construction and operations would not exceed standards established in the local general plan or noise ordinance. Operational noise from the Project would not be perceptible at sensitive receptors. Thus, there is no potential for the Project to have cumulatively considerable noise impacts.

As noted in the Transportation section, the Project is estimated to generate up to 50 one-way automobile trips per day, which is below the OPR's threshold of 110 average daily trips. As the 110 average daily trips threshold would not be exceeded, the Project's VMT impacts can be presumed to be less than significant. VMT impacts are inherently a cumulative issue as the State signed SB 743 into law to reduce statewide VMT to reduce statewide GHG emissions. Thus, there is no potential for the Project to have cumulatively considerable transportation impacts.

Considering the factors addressed above, the Project would not have a cumulatively considerable impact on any of the environmental factors evaluated in this Initial Study with mitigation incorporated. The Project site is within an industrial area of the City and would not substantially contribute to cumulative impacts associated with development of the Project area. Therefore, cumulative impacts would be less than significant with mitigation incorporated and the Project would not result in cumulatively considerable impacts when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

c) **Less-than-Significant Impact with Mitigation.** As described in the preceding sections of this Initial Study, the Project would not result in impacts that would result in substantial adverse effects on human beings, either directly or indirectly. The Project would not result in significant impacts to GHG emissions, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, and wildfire. Impacts to air quality (including health risk) would be less than significant with mitigation incorporated. Therefore, the Project would result in a less-than-significant impact with mitigation.

APPENDIX A

AIR QUALITY, GREENHOUSE GAS EMISSIONS, & ENERGY SUPPORTING INFORMATION

1. Pencco Iron Salts Construction Emissions CalEEMod Output (64 pages)
2. Pencco Iron Salts - CalEEMod Version 2022.1.1.24 Construction Inputs Summary (1 page)
3. Pencco Iron Salts Operations Emissions CalEEMod Output (33 pages)
4. Pencco Iron Salts - CalEEMod Version 2022.1.1.24 Operational Inputs Summary (1 page)
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6. Scrubber Emissions (1 page)
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Pencco Iron Salts Construction Emissions Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Pencco Iron Salts Construction Emissions
Construction Start Date	5/26/2025
Lead Agency	City of Pittsburg
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.60
Precipitation (days)	0.80
Location	38.026059092498514, -121.85682975122913
County	Contra Costa
City	Pittsburg
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1347
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.26

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Heavy Industry	4.31	1000sqft	0.71	4,310	0.00	0.00	—	—
Parking Lot	6.00	Space	0.05	0.00	0.00	0.00	—	—

Other Asphalt Surfaces	1.00	1000sqft	0.02	0.00	0.00	0.00	—	—
Other Non-Asphalt Surfaces	26.0	1000sqft	0.60	0.00	0.00	0.00	—	—
User Defined Linear	0.03	Mile	0.02	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-5	Use Advanced Engine Tiers
Construction	C-10-A	Water Exposed Surfaces
Construction	C-10-B	Water Active Demolition Sites
Construction	C-10-C	Water Unpaved Construction Roads
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-12	Sweep Paved Roads

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.32	3.11	28.3	19.6	0.11	0.73	9.32	10.0	0.60	3.64	4.25	—	16,202	16,202	1.18	2.28	31.8	16,942
Mit.	2.73	2.64	19.1	19.4	0.11	0.30	6.00	6.29	0.21	2.06	2.27	—	16,202	16,202	1.18	2.28	31.8	16,942
% Reduced	18%	15%	33%	1%	—	59%	36%	37%	65%	43%	46%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	0.81	0.64	7.09	8.53	0.02	0.24	0.52	0.75	0.22	0.14	0.35	—	2,815	2,815	0.13	0.21	0.11	2,882
Mit.	0.32	0.24	2.59	9.70	0.02	0.04	0.52	0.56	0.04	0.14	0.18	—	2,815	2,815	0.13	0.21	0.11	2,882
% Reduced	61%	62%	63%	-14%	—	82%	—	26%	80%	—	49%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.44	0.32	3.86	4.26	0.01	0.12	0.57	0.69	0.11	0.17	0.28	—	1,654	1,654	0.09	0.15	1.16	1,704
Mit.	0.21	0.16	1.70	4.71	0.01	0.03	0.44	0.47	0.02	0.12	0.15	—	1,654	1,654	0.09	0.15	1.16	1,704
% Reduced	52%	49%	56%	-11%	—	78%	22%	32%	78%	28%	48%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.08	0.06	0.70	0.78	< 0.005	0.02	0.10	0.13	0.02	0.03	0.05	—	274	274	0.01	0.03	0.19	282
Mit.	0.04	0.03	0.31	0.86	< 0.005	< 0.005	0.08	0.09	< 0.005	0.02	0.03	—	274	274	0.01	0.03	0.19	282
% Reduced	52%	49%	56%	-11%	—	78%	22%	32%	78%	28%	48%	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.80	1.46	28.3	19.6	0.11	0.73	9.32	10.0	0.60	3.64	4.25	—	16,202	16,202	1.18	2.28	31.8	16,942
2026	3.32	3.11	17.1	17.6	0.06	0.48	2.00	2.48	0.42	0.54	0.95	—	8,780	8,780	0.56	1.03	14.9	9,115
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.81	0.64	7.09	8.53	0.02	0.24	0.52	0.75	0.22	0.14	0.35	—	2,815	2,815	0.13	0.21	0.11	2,882
2026	0.78	0.59	6.65	8.41	0.02	0.21	0.52	0.72	0.19	0.14	0.33	—	2,789	2,789	0.13	0.21	0.10	2,855

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.44	0.32	3.86	4.26	0.01	0.12	0.57	0.69	0.11	0.17	0.28	—	1,654	1,654	0.09	0.15	1.16	1,704
2026	0.40	0.32	2.88	3.54	0.01	0.09	0.25	0.33	0.08	0.06	0.15	—	1,253	1,253	0.06	0.10	0.78	1,286
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.08	0.06	0.70	0.78	< 0.005	0.02	0.10	0.13	0.02	0.03	0.05	—	274	274	0.01	0.03	0.19	282
2026	0.07	0.06	0.53	0.65	< 0.005	0.02	0.04	0.06	0.01	0.01	0.03	—	207	207	0.01	0.02	0.13	213

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.66	0.54	19.1	19.4	0.11	0.30	6.00	6.29	0.21	2.06	2.27	—	16,202	16,202	1.18	2.28	31.8	16,942
2026	2.73	2.64	10.7	19.1	0.06	0.20	2.00	2.20	0.16	0.54	0.70	—	8,780	8,780	0.56	1.03	14.9	9,115
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.32	0.24	2.59	9.70	0.02	0.04	0.52	0.56	0.04	0.14	0.18	—	2,815	2,815	0.13	0.21	0.11	2,882
2026	0.31	0.22	2.48	9.60	0.02	0.04	0.52	0.56	0.04	0.14	0.18	—	2,789	2,789	0.13	0.21	0.10	2,855
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.18	0.12	1.70	4.71	0.01	0.03	0.44	0.47	0.02	0.12	0.15	—	1,654	1,654	0.09	0.15	1.16	1,704
2026	0.21	0.16	1.20	4.01	0.01	0.02	0.25	0.27	0.02	0.06	0.08	—	1,253	1,253	0.06	0.10	0.78	1,286
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.03	0.02	0.31	0.86	< 0.005	< 0.005	0.08	0.09	< 0.005	0.02	0.03	—	274	274	0.01	0.03	0.19	282
2026	0.04	0.03	0.22	0.73	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.02	—	207	207	0.01	0.02	0.13	213

3. Construction Emissions Details

3.1. Utilities (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.37	0.52	< 0.005	0.02	—	0.02	0.02	—	0.02	—	76.2	76.2	< 0.005	< 0.005	—	76.5
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.18	4.18	< 0.005	< 0.005	—	4.19
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.69	0.69	< 0.005	< 0.005	—	0.69
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	22.0	22.0	< 0.005	< 0.005	0.09	22.4
Vendor	0.01	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	54.0	54.0	< 0.005	0.01	0.14	56.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.12	1.12	< 0.005	< 0.005	< 0.005	1.13
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.96	2.96	< 0.005	< 0.005	< 0.005	3.09
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.18	0.18	< 0.005	< 0.005	< 0.005	0.19
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.49	0.49	< 0.005	< 0.005	< 0.005	0.51
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Utilities (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.04	0.54	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	76.2	76.2	< 0.005	< 0.005	—	76.5
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.18	4.18	< 0.005	< 0.005	—	4.19
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.69	0.69	< 0.005	< 0.005	—	0.69
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	22.0	22.0	< 0.005	< 0.005	0.09	22.4
Vendor	0.01	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	54.0	54.0	< 0.005	0.01	0.14	56.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.12	1.12	< 0.005	< 0.005	< 0.005	1.13
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.96	2.96	< 0.005	< 0.005	< 0.005	3.09
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.18	0.18	< 0.005	< 0.005	< 0.005	0.19
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.49	0.49	< 0.005	< 0.005	< 0.005	0.51
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Backfill/Paving (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.22	0.18	1.83	2.63	< 0.005	0.08	—	0.08	0.08	—	0.08	—	404	404	0.02	< 0.005	—	405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.1	11.1	< 0.005	< 0.005	—	11.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.83	1.83	< 0.005	< 0.005	—	1.84
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.31	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	66.1	66.1	< 0.005	< 0.005	0.26	67.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.67	1.67	< 0.005	< 0.005	< 0.005	1.70
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.28
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Backfill/Paving (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.39	2.79	< 0.005	0.02	—	0.02	0.01	—	0.01	—	404	404	0.02	< 0.005	—	405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.1	11.1	< 0.005	< 0.005	—	11.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.83	1.83	< 0.005	< 0.005	—	1.84
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.31	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	66.1	66.1	< 0.005	< 0.005	0.26	67.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.67	1.67	< 0.005	< 0.005	< 0.005	1.70
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.28
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Trenching (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.32	0.27	2.11	2.88	< 0.005	0.09	—	0.09	0.08	—	0.08	—	425	425	0.02	< 0.005	—	427
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.02	0.01	0.12	0.16	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23.3	23.3	< 0.005	< 0.005	—	23.4
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.86	3.86	< 0.005	< 0.005	—	3.87
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.21	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	44.1	44.1	< 0.005	< 0.005	0.17	44.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.23	2.23	< 0.005	< 0.005	< 0.005	2.27

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Trenching (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	1.08	2.97	< 0.005	0.01	—	0.01	0.01	—	0.01	—	425	425	0.02	< 0.005	—	427
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.06	0.16	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23.3	23.3	< 0.005	< 0.005	—	23.4
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	< 0.005	< 0.005	0.01	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.86	3.86	< 0.005	< 0.005	—	3.87
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.21	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	44.1	44.1	< 0.005	< 0.005	0.17	44.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.23	2.23	< 0.005	< 0.005	< 0.005	2.27
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Demolition (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.56	0.47	4.33	5.65	0.01	0.16	—	0.16	0.14	—	0.14	—	852	852	0.03	0.01	—	855
Demoliti on	—	—	—	—	—	—	6.10	6.10	—	0.92	0.92	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.7	11.7	< 0.005	< 0.005	—	11.7
Demoliti on	—	—	—	—	—	—	0.08	0.08	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.93	1.93	< 0.005	< 0.005	—	1.94
Demoliti on	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	< 0.005	0.01	0.70	179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.49	0.10	6.20	2.98	0.03	0.09	1.26	1.35	0.06	0.35	0.41	—	4,880	4,880	0.38	0.77	10.6	5,130

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.23	2.23	< 0.005	< 0.005	< 0.005	2.27
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	66.9	66.9	0.01	0.01	0.06	70.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	11.1	11.1	< 0.005	< 0.005	0.01	11.6

3.8. Demolition (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.10	1.47	5.63	0.01	0.02	—	0.02	0.02	—	0.02	—	852	852	0.03	0.01	—	855
Demolition	—	—	—	—	—	—	3.90	3.90	—	0.59	0.59	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	< 0.005	< 0.005	0.02	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.7	11.7	< 0.005	< 0.005	—	11.7
Demoliti on	—	—	—	—	—	—	0.05	0.05	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.93	1.93	< 0.005	< 0.005	—	1.94
Demoliti on	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	< 0.005	0.01	0.70	179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.49	0.10	6.20	2.98	0.03	0.09	1.26	1.35	0.06	0.35	0.41	—	4,880	4,880	0.38	0.77	10.6	5,130
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.23	2.23	< 0.005	< 0.005	< 0.005	2.27
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	66.9	66.9	0.01	0.01	0.06	70.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	11.1	11.1	< 0.005	< 0.005	0.01	11.6

3.9. Site Preparation (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.56	0.47	4.16	5.57	0.01	0.21	—	0.21	0.20	—	0.20	—	859	859	0.03	0.01	—	862
Dust From Material Movement	—	—	—	—	—	—	0.53	0.53	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.8	11.8	< 0.005	< 0.005	—	11.8
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.95	1.95	< 0.005	< 0.005	—	1.95
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	< 0.005	0.01	0.70	179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.23	2.23	< 0.005	< 0.005	< 0.005	2.27
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Site Preparation (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.08	0.42	5.99	0.01	0.02	—	0.02	0.02	—	0.02	—	859	859	0.03	0.01	—	862
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.8	11.8	< 0.005	< 0.005	—	11.8
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.95	1.95	< 0.005	< 0.005	—	1.95
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	< 0.005	0.01	0.70	179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.23	2.23	< 0.005	< 0.005	< 0.005	2.27
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Grading (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.29	1.09	10.1	10.0	0.02	0.46	—	0.46	0.43	—	0.43	—	1,714	1,714	0.07	0.01	—	1,720
Dust From Material Movement	—	—	—	—	—	—	5.45	5.45	—	2.59	2.59	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.28	0.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	47.0	47.0	< 0.005	< 0.005	—	47.1
Dust From Material Movement	—	—	—	—	—	—	0.15	0.15	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.77	7.77	< 0.005	< 0.005	—	7.80
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	< 0.005	0.01	0.70	179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	1.43	0.30	18.2	8.74	0.09	0.26	3.71	3.97	0.18	1.02	1.19	—	14,312	14,312	1.11	2.26	31.1	15,044
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.47	4.47	< 0.005	< 0.005	0.01	4.53
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	0.01	0.51	0.24	< 0.005	0.01	0.10	0.11	< 0.005	0.03	0.03	—	392	392	0.03	0.06	0.37	412
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.75
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	64.9	64.9	0.01	0.01	0.06	68.2

3.12. Grading (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.16	0.84	9.79	0.02	0.03	—	0.03	0.03	—	0.03	—	1,714	1,714	0.07	0.01	—	1,720

Dust From Material Movement	—	—	—	—	—	—	2.12	2.12	—	1.01	1.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.27	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	47.0	47.0	< 0.005	< 0.005	—	47.1
Dust From Material Movement	—	—	—	—	—	—	0.06	0.06	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.77	7.77	< 0.005	< 0.005	—	7.80
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	< 0.005	0.01	0.70	179

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	1.43	0.30	18.2	8.74	0.09	0.26	3.71	3.97	0.18	1.02	1.19	—	14,312	14,312	1.11	2.26	31.1	15,044
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.47	4.47	< 0.005	< 0.005	0.01	4.53
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	0.01	0.51	0.24	< 0.005	0.01	0.10	0.11	< 0.005	0.03	0.03	—	392	392	0.03	0.06	0.37	412
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.75
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	64.9	64.9	0.01	0.01	0.06	68.2

3.13. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	5.14	6.94	0.01	0.22	—	0.22	0.20	—	0.20	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.62	0.52	5.14	6.94	0.01	0.22	—	0.22	0.20	—	0.20	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.24	0.20	1.95	2.63	< 0.005	0.08	—	0.08	0.08	—	0.08	—	495	495	0.02	< 0.005	—	497
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.36	0.48	< 0.005	0.02	—	0.02	0.01	—	0.01	—	82.0	82.0	< 0.005	< 0.005	—	82.3
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	< 0.005	0.01	0.70	179
Vendor	0.13	0.05	1.79	0.86	0.01	0.02	0.35	0.37	0.02	0.10	0.12	—	1,349	1,349	0.07	0.19	3.58	1,412
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.06	0.71	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	161	161	< 0.005	0.01	0.02	163
Vendor	0.13	0.05	1.88	0.88	0.01	0.02	0.35	0.37	0.02	0.10	0.12	—	1,349	1,349	0.07	0.19	0.09	1,409
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.03	0.03	0.02	0.26	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	61.9	61.9	< 0.005	< 0.005	0.11	62.8
Vendor	0.05	0.02	0.70	0.33	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	512	512	0.03	0.07	0.59	535
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.2	10.2	< 0.005	< 0.005	0.02	10.4
Vendor	0.01	< 0.005	0.13	0.06	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	84.8	84.8	< 0.005	0.01	0.10	88.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Building Construction (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.12	0.64	8.10	0.01	0.02	—	0.02	0.02	—	0.02	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.12	0.64	8.10	0.01	0.02	—	0.02	0.02	—	0.02	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.05	0.05	0.24	3.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	495	495	0.02	< 0.005	—	497
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.04	0.56	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	82.0	82.0	< 0.005	< 0.005	—	82.3
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	< 0.005	0.01	0.70	179
Vendor	0.13	0.05	1.79	0.86	0.01	0.02	0.35	0.37	0.02	0.10	0.12	—	1,349	1,349	0.07	0.19	3.58	1,412
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.06	0.71	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	161	161	< 0.005	0.01	0.02	163
Vendor	0.13	0.05	1.88	0.88	0.01	0.02	0.35	0.37	0.02	0.10	0.12	—	1,349	1,349	0.07	0.19	0.09	1,409
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.26	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	61.9	61.9	< 0.005	< 0.005	0.11	62.8
Vendor	0.05	0.02	0.70	0.33	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	512	512	0.03	0.07	0.59	535
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.2	10.2	< 0.005	< 0.005	0.02	10.4
Vendor	0.01	< 0.005	0.13	0.06	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	84.8	84.8	< 0.005	0.01	0.10	88.6

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	0.19	1.86	2.68	< 0.005	0.07	—	0.07	0.07	—	0.07	—	505	505	0.02	< 0.005	—	507
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.04	0.03	0.34	0.49	< 0.005	0.01	—	0.01	0.01	—	0.01	—	83.7	83.7	< 0.005	< 0.005	—	84.0
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.78	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	173	173	< 0.005	0.01	0.64	176
Vendor	0.13	0.04	1.70	0.83	0.01	0.02	0.35	0.37	0.02	0.10	0.12	—	1,326	1,326	0.07	0.19	3.20	1,389
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.66	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	158	158	< 0.005	0.01	0.02	160
Vendor	0.12	0.04	1.79	0.84	0.01	0.02	0.35	0.37	0.02	0.10	0.12	—	1,326	1,326	0.07	0.19	0.08	1,386
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.02	0.25	0.00	0.00	0.06	0.06	0.00	0.02	0.02	—	62.0	62.0	< 0.005	< 0.005	0.11	62.9
Vendor	0.05	0.02	0.68	0.32	< 0.005	0.01	0.14	0.14	0.01	0.04	0.04	—	514	514	0.03	0.08	0.53	537
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.3	10.3	< 0.005	< 0.005	0.02	10.4
Vendor	0.01	< 0.005	0.12	0.06	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	85.1	85.1	< 0.005	0.01	0.09	89.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.16. Building Construction (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.12	0.64	8.10	0.01	0.02	—	0.02	0.02	—	0.02	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.12	0.64	8.10	0.01	0.02	—	0.02	0.02	—	0.02	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	0.25	3.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	505	505	0.02	< 0.005	—	507
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.57	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	83.7	83.7	< 0.005	< 0.005	—	84.0
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.78	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	173	173	< 0.005	0.01	0.64	176
Vendor	0.13	0.04	1.70	0.83	0.01	0.02	0.35	0.37	0.02	0.10	0.12	—	1,326	1,326	0.07	0.19	3.20	1,389
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.66	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	158	158	< 0.005	0.01	0.02	160
Vendor	0.12	0.04	1.79	0.84	0.01	0.02	0.35	0.37	0.02	0.10	0.12	—	1,326	1,326	0.07	0.19	0.08	1,386
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.02	0.25	0.00	0.00	0.06	0.06	0.00	0.02	0.02	—	62.0	62.0	< 0.005	< 0.005	0.11	62.9
Vendor	0.05	0.02	0.68	0.32	< 0.005	0.01	0.14	0.14	0.01	0.04	0.04	—	514	514	0.03	0.08	0.53	537
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.3	10.3	< 0.005	< 0.005	0.02	10.4
Vendor	0.01	< 0.005	0.12	0.06	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	85.1	85.1	< 0.005	0.01	0.09	89.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Paving (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.59	0.49	4.24	5.30	0.01	0.18	—	0.18	0.16	—	0.16	—	823	823	0.03	0.01	—	826
Paving	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.5	22.5	< 0.005	< 0.005	—	22.6
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.73	3.73	< 0.005	< 0.005	—	3.75
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.78	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	173	173	< 0.005	0.01	0.64	176
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.51	0.11	6.23	3.01	0.03	0.09	1.32	1.41	0.06	0.36	0.42	—	4,981	4,981	0.39	0.80	10.4	5,241

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.38	4.38	< 0.005	< 0.005	0.01	4.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.18	0.08	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	137	137	0.01	0.02	0.12	143
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.73	0.73	< 0.005	< 0.005	< 0.005	0.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	22.6	22.6	< 0.005	< 0.005	0.02	23.7

3.18. Paving (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.23	2.09	5.55	0.01	0.06	—	0.06	0.06	—	0.06	—	823	823	0.03	0.01	—	826
Paving	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.01	0.01	0.06	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.5	22.5	< 0.005	< 0.005	—	22.6
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	< 0.005	< 0.005	0.01	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.73	3.73	< 0.005	< 0.005	—	3.75
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.78	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	173	173	< 0.005	0.01	0.64	176
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.51	0.11	6.23	3.01	0.03	0.09	1.32	1.41	0.06	0.36	0.42	—	4,981	4,981	0.39	0.80	10.4	5,241
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.38	4.38	< 0.005	< 0.005	0.01	4.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.18	0.08	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	137	137	0.01	0.02	0.12	143
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.73	0.73	< 0.005	< 0.005	< 0.005	0.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	22.6	22.6	< 0.005	< 0.005	0.02	23.7

3.19. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	2.32	2.32	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.66	3.66	< 0.005	< 0.005	—	3.67
Architectural Coatings	0.06	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.61	0.61	< 0.005	< 0.005	—	0.61
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.78	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	173	173	< 0.005	0.01	0.64	176
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.38	4.38	< 0.005	< 0.005	0.01	4.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.73	0.73	< 0.005	< 0.005	< 0.005	0.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.20. Architectural Coating (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	2.32	2.32	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.66	3.66	< 0.005	< 0.005	—	3.67
Architectural Coatings	0.06	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.61	0.61	< 0.005	< 0.005	—	0.61

Architectural Coating	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.78	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	173	173	< 0.005	0.01	0.64	176
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.38	4.38	< 0.005	< 0.005	0.01	4.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.73	0.73	< 0.005	< 0.005	< 0.005	0.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetati	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Utilities	Linear, Drainage, Utilities, & Sub-Grade	8/16/2025	9/12/2025	5.00	20.0	Pipe Installation
Backfill/Paving	Linear, Paving	9/13/2025	9/26/2025	5.00	10.0	Backfill and Paving
Trenching	Linear, Trenching	7/19/2025	8/15/2025	5.00	20.0	Trenching
Demolition	Demolition	5/26/2025	5/30/2025	5.00	5.00	—
Site Preparation	Site Preparation	6/02/2025	6/7/2025	5.00	5.00	—
Grading	Grading	6/09/2025	6/20/2025	5.00	10.0	—
Building Construction	Building Construction	6/21/2025	7/17/2026	5.00	280	—
Paving	Paving	6/22/2026	7/3/2026	5.00	10.0	—
Architectural Coating	Architectural Coating	7/05/2026	7/17/2026	5.00	10.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Utilities	Forklifts	Diesel	Average	1.00	4.00	82.0	0.20

Backfill/Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Backfill/Paving	Cement and Mortar Mixers	Diesel	Average	1.00	4.00	10.0	0.56
Backfill/Paving	Pavers	Diesel	Average	1.00	4.00	81.0	0.42
Trenching	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50
Trenching	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	6.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Paving	Cement and Mortar Mixers	Diesel	Average	4.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	7.00	81.0	0.42
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Utilities	Forklifts	Diesel	Tier 4 Final	1.00	4.00	82.0	0.20
Backfill/Paving	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	6.00	84.0	0.37
Backfill/Paving	Cement and Mortar Mixers	Diesel	Average	1.00	4.00	10.0	0.56
Backfill/Paving	Pavers	Diesel	Tier 4 Final	1.00	4.00	81.0	0.42
Trenching	Trenchers	Diesel	Tier 4 Final	1.00	8.00	40.0	0.50
Trenching	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	6.00	84.0	0.37
Demolition	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	1.00	367	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.00	6.00	84.0	0.37
Site Preparation	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Tier 4 Final	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Tier 4 Final	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 4 Final	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.00	8.00	84.0	0.37
Paving	Cement and Mortar Mixers	Diesel	Average	4.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Tier 4 Final	1.00	7.00	81.0	0.42
Paving	Rollers	Diesel	Tier 4 Final	1.00	7.00	36.0	0.38

Paving	Tractors/Loaders/Back	Diesel	Tier 4 Final	1.00	7.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Tier 4 Final	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	20.0	11.7	LDA,LDT1,LDT2
Demolition	Vendor	—	8.40	HHDT,MHDT
Demolition	Hauling	68.2	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	20.0	11.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.40	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	200	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	20.0	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	50.0	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—

Paving	Worker	20.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	71.0	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	20.0	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Utilities	—	—	—	—
Utilities	Worker	2.50	11.7	LDA,LDT1,LDT2
Utilities	Vendor	2.00	8.40	HHDT,MHDT
Utilities	Hauling	0.00	20.0	HHDT
Utilities	Onsite truck	—	—	HHDT
Backfill/Paving	—	—	—	—
Backfill/Paving	Worker	7.50	11.7	LDA,LDT1,LDT2
Backfill/Paving	Vendor	0.00	8.40	HHDT,MHDT
Backfill/Paving	Hauling	0.00	20.0	HHDT
Backfill/Paving	Onsite truck	—	—	HHDT
Trenching	—	—	—	—
Trenching	Worker	5.00	11.7	LDA,LDT1,LDT2
Trenching	Vendor	—	8.40	HHDT,MHDT
Trenching	Hauling	0.00	20.0	HHDT
Trenching	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—

Demolition	Worker	20.0	11.7	LDA,LDT1,LDT2
Demolition	Vendor	—	8.40	HHDT,MHDT
Demolition	Hauling	68.2	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	20.0	11.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.40	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	200	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	20.0	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	50.0	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	71.0	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	20.0	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT

Architectural Coating	Onsite truck	—	—	HHDT
Utilities	—	—	—	—
Utilities	Worker	2.50	11.7	LDA,LDT1,LDT2
Utilities	Vendor	2.00	8.40	HHDT,MHDT
Utilities	Hauling	0.00	20.0	HHDT
Utilities	Onsite truck	—	—	HHDT
Backfill/Paving	—	—	—	—
Backfill/Paving	Worker	7.50	11.7	LDA,LDT1,LDT2
Backfill/Paving	Vendor	0.00	8.40	HHDT,MHDT
Backfill/Paving	Hauling	0.00	20.0	HHDT
Backfill/Paving	Onsite truck	—	—	HHDT
Trenching	—	—	—	—
Trenching	Worker	5.00	11.7	LDA,LDT1,LDT2
Trenching	Vendor	—	8.40	HHDT,MHDT
Trenching	Hauling	0.00	20.0	HHDT
Trenching	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	0.00	2,155	1,761

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Utilities	—	—	0.02	0.00	—
Demolition	0.00	0.00	0.00	1,363	—
Site Preparation	—	—	2.50	0.00	—
Grading	—	16,000	7.50	0.00	—
Paving	0.00	0.00	0.00	0.00	0.69

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
General Heavy Industry	0.00	0%
Parking Lot	0.05	100%
Other Asphalt Surfaces	0.02	100%
Other Non-Asphalt Surfaces	0.60	0%
User Defined Linear	0.02	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	204	0.03	< 0.005
2026	0.00	204	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	18.8	annual days of extreme heat
Extreme Precipitation	2.20	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	1	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	1	1	1	2
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	37.6
AQ-PM	30.7
AQ-DPM	55.5
Drinking Water	19.0

Lead Risk Housing	34.5
Pesticides	0.00
Toxic Releases	70.5
Traffic	15.7
Effect Indicators	—
CleanUp Sites	98.9
Groundwater	91.6
Haz Waste Facilities/Generators	99.5
Impaired Water Bodies	98.7
Solid Waste	88.9
Sensitive Population	—
Asthma	93.2
Cardio-vascular	72.2
Low Birth Weights	93.5
Socioeconomic Factor Indicators	—
Education	40.1
Housing	44.5
Linguistic	10.4
Poverty	54.8
Unemployment	94.3

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	61.92737072
Employed	28.26895932
Median HI	59.96407032

Education	—
Bachelor's or higher	44.02669062
High school enrollment	26.62645964
Preschool enrollment	89.60605672
Transportation	—
Auto Access	59.70742974
Active commuting	70.52482998
Social	—
2-parent households	8.674451431
Voting	68.98498653
Neighborhood	—
Alcohol availability	38.56024637
Park access	81.35506224
Retail density	17.37456692
Supermarket access	73.05273964
Tree canopy	50.69934557
Housing	—
Homeownership	53.70204029
Housing habitability	43.8855383
Low-inc homeowner severe housing cost burden	32.01591172
Low-inc renter severe housing cost burden	18.72192994
Uncrowded housing	45.96432696
Health Outcomes	—
Insured adults	52.48299756
Arthritis	0.0
Asthma ER Admissions	1.2
High Blood Pressure	0.0
Cancer (excluding skin)	0.0

Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	25.8
Cognitively Disabled	38.1
Physically Disabled	17.3
Heart Attack ER Admissions	3.0
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	30.7
Children	20.9
Elderly	49.5
English Speaking	84.5
Foreign-born	38.5
Outdoor Workers	81.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	30.0

Traffic Density	11.7
Traffic Access	23.0
Other Indices	—
Hardship	49.9
Other Decision Support	—
2016 Voting	29.6

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	83.0
Healthy Places Index Score for Project Location (b)	59.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Project Details	Project is an urban industrial area of the City
Land Use	4,310 SF of new equipment, 1.38-acre site, 27,000 SF new paving, 6 new parking spaces

Construction: Construction Phases	Pencco, 2024
Construction: Off-Road Equipment	Pencco, 2024
Construction: Architectural Coatings	no interior coating on proposed equipment
Construction: Trips and VMT	Increased worker trips to account for greater amount of workers and cement import.

Pencco Iron Salts - CalEEMod Version 2022.1.1.24 Inputs

Project Characteristics

Start of Construction: May 26, 2025

Land Use Setting: Urban

Land Use

Project site – 1.38 acres

Industrial – General Heavy Industry – 4,310 Sq Ft of New Equipment/Structures

Parking – Parking lot – 6 spaces

Parking – other asphalt surfaces: 1,000 Square Feet for Interface between new Concrete Containment and Existing Asphalt

Parking – other non asphalt surfaces: 26,000 Square Feet for Concrete Containment

User Defined Linear – 160 foot pipeline (0.03 mile) 120 Feet for HCL, 40 Feet for Chlorine

Source: Data request response from ERM, May 28, 2024.

Construction

1. Adjusted Construction Phase Lengths Per Data Request Response
2. Added Trenching, Utilities, and Backfill/Paving Phases for Linear Pipeline
3. Adjusted Construction Equipment Per Data Request Response
4. Added Equipment for Linear Pipeline Installation Phases
5. Material Exported for Concrete Containment: 16,000 cubic yards
6. Demolition of Existing Asphalt: 1,363 tons of debris
7. Increased Worker Trips for Facility Construction Workers
8. Added Haul Trips to Account for incoming cement for paving of containment area and interface
9. Added Vendor Trips to account for incoming equipment/structure installation
10. Added Vendor Trips for pipeline installation materials

Pencco Iron Salts Operations Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Pencco Iron Salts Operations
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.60
Precipitation (days)	0.80
Location	38.02589864026959, -121.85479258121907
County	Contra Costa
City	Pittsburg
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1347
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.26

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Heavy Industry	2.31	1000sqft	0.36	2,310	0.00	0.00	—	—

General Heavy Industry	2.00	1000sqft	0.35	2,000	0.00	0.00	—	—
Parking Lot	6.00	Space	0.05	0.00	0.00	0.00	—	—
Other Asphalt Surfaces	1.00	1000sqft	0.02	0.00	0.00	0.00	—	—
Other Non-Asphalt Surfaces	26.0	1000sqft	0.60	0.00	0.00	0.00	—	—
User Defined Linear	0.03	Mile	0.02	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	42.3	42.1	3.73	10.4	0.03	0.05	0.80	0.85	0.05	0.21	0.26	13.3	3,104	3,117	1.57	0.49	6.89	3,309
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	42.3	42.1	3.90	10.4	0.03	0.05	0.80	0.85	0.05	0.21	0.26	13.3	3,104	3,117	1.57	0.49	1.27	3,304
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	30.2	30.0	2.75	7.39	0.02	0.04	0.57	0.61	0.04	0.15	0.19	13.3	2,224	2,238	1.51	0.36	2.90	2,385
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.51	5.48	0.50	1.35	< 0.005	0.01	0.10	0.11	0.01	0.03	0.03	2.20	368	370	0.25	0.06	0.48	395

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.26	0.04	3.28	1.54	0.03	0.05	0.80	0.84	0.05	0.21	0.26	—	2,912	2,912	0.21	0.46	5.77	3,062
Area	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	7.82	7.82	< 0.005	< 0.005	—	7.90
Water	—	—	—	—	—	—	—	—	—	—	—	10.0	18.9	29.0	1.03	0.02	—	62.2
Waste	—	—	—	—	—	—	—	—	—	—	—	3.24	0.00	3.24	0.32	0.00	—	11.3
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.12	1.12
Off-Road	42.0	41.9	0.45	8.83	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	165	165	0.01	< 0.005	—	165
Total	42.3	42.1	3.73	10.4	0.03	0.05	0.80	0.85	0.05	0.21	0.26	13.3	3,104	3,117	1.57	0.49	6.89	3,309
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.25	0.04	3.46	1.54	0.03	0.05	0.80	0.84	0.05	0.21	0.26	—	2,913	2,913	0.21	0.46	0.15	3,056
Area	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	7.82	7.82	< 0.005	< 0.005	—	7.90
Water	—	—	—	—	—	—	—	—	—	—	—	10.0	18.9	29.0	1.03	0.02	—	62.2
Waste	—	—	—	—	—	—	—	—	—	—	—	3.24	0.00	3.24	0.32	0.00	—	11.3
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.12	1.12
Off-Road	42.0	41.9	0.45	8.83	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	165	165	0.01	< 0.005	—	165
Total	42.3	42.1	3.90	10.4	0.03	0.05	0.80	0.85	0.05	0.21	0.26	13.3	3,104	3,117	1.57	0.49	1.27	3,304
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.18	0.03	2.43	1.10	0.02	0.03	0.57	0.60	0.03	0.15	0.19	—	2,080	2,080	0.15	0.33	1.78	2,185

Area	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	7.82	7.82	< 0.005	< 0.005	—	7.90
Water	—	—	—	—	—	—	—	—	—	—	—	10.0	18.9	29.0	1.03	0.02	—	62.2
Waste	—	—	—	—	—	—	—	—	—	—	—	3.24	0.00	3.24	0.32	0.00	—	11.3
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.12	1.12
Off-Road	29.9	29.9	0.32	6.29	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	117	117	< 0.005	< 0.005	—	118
Total	30.2	30.0	2.75	7.39	0.02	0.04	0.57	0.61	0.04	0.15	0.19	13.3	2,224	2,238	1.51	0.36	2.90	2,385
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.03	0.01	0.44	0.20	< 0.005	0.01	0.10	0.11	0.01	0.03	0.03	—	344	344	0.02	0.05	0.29	362
Area	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	1.30	1.30	< 0.005	< 0.005	—	1.31
Water	—	—	—	—	—	—	—	—	—	—	—	1.66	3.14	4.80	0.17	< 0.005	—	10.3
Waste	—	—	—	—	—	—	—	—	—	—	—	0.54	0.00	0.54	0.05	0.00	—	1.87
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Off-Road	5.46	5.45	0.06	1.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19.4	19.4	< 0.005	< 0.005	—	19.5
Total	5.51	5.48	0.50	1.35	< 0.005	0.01	0.10	0.11	0.01	0.03	0.03	2.20	368	370	0.25	0.06	0.48	395

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

General Heavy Industry	0.26	0.04	3.28	1.54	0.03	0.05	0.80	0.84	0.05	0.21	0.26	—	2,912	2,912	0.21	0.46	5.77	3,062
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.26	0.04	3.28	1.54	0.03	0.05	0.80	0.84	0.05	0.21	0.26	—	2,912	2,912	0.21	0.46	5.77	3,062
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	0.25	0.04	3.46	1.54	0.03	0.05	0.80	0.84	0.05	0.21	0.26	—	2,913	2,913	0.21	0.46	0.15	3,056
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.25	0.04	3.46	1.54	0.03	0.05	0.80	0.84	0.05	0.21	0.26	—	2,913	2,913	0.21	0.46	0.15	3,056
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	0.03	0.01	0.44	0.20	< 0.005	0.01	0.10	0.11	0.01	0.03	0.03	—	344	344	0.02	0.05	0.29	362
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.03	0.01	0.44	0.20	< 0.005	0.01	0.10	0.11	0.01	0.03	0.03	—	344	344	0.02	0.05	0.29	362

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	—	7.82	7.82	< 0.005	< 0.005	—	7.90
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	7.82	7.82	< 0.005	< 0.005	—	7.90
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	—	7.82	7.82	< 0.005	< 0.005	—	7.90
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	7.82	7.82	< 0.005	< 0.005	—	7.90
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	—	1.30	1.30	< 0.005	< 0.005	—	1.31
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1.30	1.30	< 0.005	< 0.005	—	1.31

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.09	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.09	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coating	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	10.0	18.9	29.0	1.03	0.02	—	62.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	10.0	18.9	29.0	1.03	0.02	—	62.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	10.0	18.9	29.0	1.03	0.02	—	62.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	10.0	18.9	29.0	1.03	0.02	—	62.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	1.66	3.14	4.80	0.17	< 0.005	—	10.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	1.66	3.14	4.80	0.17	< 0.005	—	10.3

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	3.24	0.00	3.24	0.32	0.00	—	11.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.24	0.00	3.24	0.32	0.00	—	11.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	3.24	0.00	3.24	0.32	0.00	—	11.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.24	0.00	3.24	0.32	0.00	—	11.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	0.54	0.00	0.54	0.05	0.00	—	1.87
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.54	0.00	0.54	0.05	0.00	—	1.87

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.12	1.12
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.12	1.12
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.12	1.12
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.12	1.12
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Forklifts	< 0.005	0.00	0.22	2.20	0.00	0.00	—	0.00	0.00	—	0.00	—	48.8	48.8	< 0.005	< 0.005	—	48.8
Aerial Lifts	0.02	0.00	0.12	4.42	0.00	0.00	—	0.00	0.00	—	0.00	—	26.0	26.0	< 0.005	< 0.005	—	26.0
Skid Steer Loaders	42.0	41.9	0.11	2.21	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	89.8	89.8	< 0.005	< 0.005	—	90.1
Total	42.0	41.9	0.45	8.83	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	165	165	0.01	< 0.005	—	165
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Forklifts	< 0.005	0.00	0.22	2.20	0.00	0.00	—	0.00	0.00	—	0.00	—	48.8	48.8	< 0.005	< 0.005	—	48.8
Aerial Lifts	0.02	0.00	0.12	4.42	0.00	0.00	—	0.00	0.00	—	0.00	—	26.0	26.0	< 0.005	< 0.005	—	26.0
Skid Steer Loaders	42.0	41.9	0.11	2.21	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	89.8	89.8	< 0.005	< 0.005	—	90.1
Total	42.0	41.9	0.45	8.83	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	165	165	0.01	< 0.005	—	165
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Forklifts	< 0.005	0.00	0.03	0.29	0.00	0.00	—	0.00	0.00	—	0.00	—	5.75	5.75	< 0.005	< 0.005	—	5.76
Aerial Lifts	< 0.005	0.00	0.02	0.57	0.00	0.00	—	0.00	0.00	—	0.00	—	3.07	3.07	< 0.005	< 0.005	—	3.07
Skid Steer Loaders	5.45	5.45	0.01	0.29	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.6	10.6	< 0.005	< 0.005	—	10.6
Total	5.46	5.45	0.06	1.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19.4	19.4	< 0.005	< 0.005	—	19.5

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
General Heavy Industry	18.0	0.00	0.00	4,693	860	0.00	0.00	224,224
General Heavy Industry	50.0	0.00	0.00	13,036	500	0.00	0.00	130,357
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	0.00	2,155	1,761

5.10.3. Landscape Equipment

Equipment Type	Fuel Type	Number Per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
General Heavy Industry	14,000	204	0.0330	0.0040	0.00
General Heavy Industry	0.00	204	0.0330	0.0040	0.00
Parking Lot	0.00	204	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	204	0.0330	0.0040	0.00
Other Non-Asphalt Surfaces	0.00	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
General Heavy Industry	5,235,000	0.00
General Heavy Industry	0.00	0.00
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
General Heavy Industry	6.01	—
General Heavy Industry	0.00	—
Parking Lot	0.00	—
Other Asphalt Surfaces	0.00	—
Other Non-Asphalt Surfaces	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
General Heavy Industry	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.00	4.00	18.0
General Heavy Industry	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Forklifts	CNG	Average	1.00	2.00	82.0	0.20
Aerial Lifts	CNG	Average	1.00	2.00	19.0	0.46
Skid Steer Loaders	Gasoline	Average	1.00	2.00	71.0	0.37

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	18.8	annual days of extreme heat
Extreme Precipitation	2.20	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	1	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	1	1	1	2
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	37.6
AQ-PM	30.7
AQ-DPM	55.5
Drinking Water	19.0
Lead Risk Housing	34.5

Pesticides	0.00
Toxic Releases	70.5
Traffic	15.7
Effect Indicators	—
CleanUp Sites	98.9
Groundwater	91.6
Haz Waste Facilities/Generators	99.5
Impaired Water Bodies	98.7
Solid Waste	88.9
Sensitive Population	—
Asthma	93.2
Cardio-vascular	72.2
Low Birth Weights	93.5
Socioeconomic Factor Indicators	—
Education	40.1
Housing	44.5
Linguistic	10.4
Poverty	54.8
Unemployment	94.3

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	61.92737072
Employed	28.26895932
Median HI	59.96407032
Education	—

Bachelor's or higher	44.02669062
High school enrollment	26.62645964
Preschool enrollment	89.60605672
Transportation	—
Auto Access	59.70742974
Active commuting	70.52482998
Social	—
2-parent households	8.674451431
Voting	68.98498653
Neighborhood	—
Alcohol availability	38.56024637
Park access	81.35506224
Retail density	17.37456692
Supermarket access	73.05273964
Tree canopy	50.69934557
Housing	—
Homeownership	53.70204029
Housing habitability	43.8855383
Low-inc homeowner severe housing cost burden	32.01591172
Low-inc renter severe housing cost burden	18.72192994
Uncrowded housing	45.96432696
Health Outcomes	—
Insured adults	52.48299756
Arthritis	0.0
Asthma ER Admissions	1.2
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0

Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	25.8
Cognitively Disabled	38.1
Physically Disabled	17.3
Heart Attack ER Admissions	3.0
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	30.7
Children	20.9
Elderly	49.5
English Speaking	84.5
Foreign-born	38.5
Outdoor Workers	81.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	30.0
Traffic Density	11.7

Traffic Access	23.0
Other Indices	—
Hardship	49.9
Other Decision Support	—
2016 Voting	29.6

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	83.0
Healthy Places Index Score for Project Location (b)	59.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Pencco, 2024
Operations: Vehicle Data	50 worker auto trips per day at 10 miles per trip 18 heavy truck trips per day at 47.78 miles per trip

Operations: Fleet Mix	All truck trips Heavy Heavy Duty Trucks Adjusted worker autos to be the ratio of LDA, LDT1 and LDT2 assumed in CalEEMod
Operations: Architectural Coatings	Only exterior of equipment/structures could potentially be repainted
Operations: Energy Use	14,000 kWh per year, no natural gas
Operations: Water and Waste Water	Pencco, 2024
Operations: Solid Waste	Pencco, 2024
Operations: Off-Road Equipment	Pencco, 2024

Pencco Iron Salts - CalEEMod Version 2022.1.1.24 Inputs

Project Characteristics

Operational Year: 2027

Land Use Setting: Urban

Land Use

Project site – 1.38 acres

Industrial – General Heavy Industry – 4,310 Sq Ft of New Equipment/Structures

Parking – Parking lot – 6 spaces

Parking – other asphalt surfaces: 1,000 Square Feet for Interface between new Concrete Containment and Existing Asphalt

Parking – other non asphalt surfaces: 26,000 Square Feet for Concrete Containment

User Defined Linear – 160 foot pipeline (0.03 mile) 120 Feet for HCL, 40 Feet for Chlorine

Source: Data request response from ERM, May 28, 2024.

Operations

1. Increased Weekday Trip Rates to Account for 50 automobile trips and 18 truck trips per day (Parking Lot Category for Automobiles and General Heavy Industry Category for Heavy Trucks). Facility would operate 5 days/week (No Weekend Trips). Conservative Trip Rate because outgoing filter solid truck trips would only occur one day per month.
2. Increased Trip Length to Account for 10 miles per one way trip for Automobiles and 47.78 mile per one way trip for Heavy Trucks. Truck Trip Distance was calculated based on average of 6 incoming iron trucks at 50 miles/trip, 10 outgoing product trucks at 40 miles/trip, and 2 outgoing filter solid trucks at 80 miles/trip). Conservative Trip Distance because outgoing filter solid truck trips would only occur one day per month.
3. Adjusted Fleet Mix to Account for all heavy heavy duty (HHDT) trucks for trucks trips and an aggregate of light duty automobiles and light duty trucks for automobile trips.
4. Adjusted Energy Usage to 14,000 kWh/year. No Natural Gas.
5. Adjusted Water Usage to 5,235,000 gals/year.
6. Adjusted Solid Waste to 6 tons/year.
7. Added Off-Road On-Site Equipment
    a. Forklift, 2 hours per day, 260 hours per year
    b. Aerial Lift, 2 hours per day, 260 hours per year
    c. Skid Steer, 2 hours per day, 260 hours per year

Source: Data request response from ERM, May 28, 2024.

Cooling Tower Operational Data				
Source Description	**Average Recirculation Flow Rate (gal/min)**	**Peak Hourly Recirculation Flow Rate[1] (gal/min)**	**Annual Operation (hrs/yr)**	**Annual Throughput[2] (gal/yr)**
Cooling Tower	737	1105.5	6,240	275,932,800

Notes: (1) Peak Hourly is conservatively estimated at 1.5 average recirculation rate.

(2) Annual Throughput = Avg Hourly Flow Rate (gal/min) * Annual Operation

Cooling Tower Emission Factors			
Process	**VOC**	**PM**	**Chloroform**
Chemical Plant Cooling Towers	0.7	19	0.018

Sources: VOC - AP-42, Section 5.1, Table 5.1-2 PM - AP-42, Section 13.4, Table 13.4-1

PM - AP-42, Section 13.4, Table 13.4-1

Chloroform - Summary of Literature Search on HAP Emissions From IPCTs (2004, RTI)

Cooling Tower Emissions			
Process	**VOC**	**PM10**	**Chloroform**
Peak Hourly Emissions (lb/hr)	0.04643	1.26027	0.00119
Annual Emissions (lb/yr)	193.15	5242.72	4.97
Average Daily Emissions (lb/day	0.74290	20.16432	0.01910

Stack Gas Exhaust Flow Rate	scfm	12,690
Stack Gas Exhaust Flow Rate	m3/hour	21,560

	MW	ppb	ug/m3	g/hour	lb/hour	lb/year	MT/year
HCL (Uncontrolled)	36.46	20,000	29,824	643	1.42	12,418	
HCL (Stage 1)	36.46	600	895	19.3	0.04	373	
HCL (Stage 2)	36.46	0.06	0.09	1.93E-03	4.25E-06	0.037	
CO2	44.01	415,000	747,004	1.61E+04	3.55E+01	311,037	141

Energy Use Summary

Construction Fuel Usage

495 MT CO2	28 MT CO2
10.16 kg/CO2/gal	8.9 kg/CO2/gal
48,720 gals Diesel	3,185 gals Gas

Operational Fuel Usage

304 MT CO2	130357 VMT
10.16 kg/CO2/gal	20 MPG
29,920 gals Diesel	6,518 gals Gas

APPENDIX B

HEALTH RISK ASSESSMENT

Health Risk Assessment Technical Report

Pittsburg Iron Salt Manufacturing Facility

PREPARED BY:

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November 11, 2024

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Attachment: Health Risk Assessment Methodology, Assumptions, and Detailed Results

HEALTH RISK ASSESSMENT TECHNICAL REPORT

Pencco Iron Salts Manufacturing Facility

1.0 INTRODUCTION

A health impact assessment (HRA) has been completed for the Pencco Iron Salts Manufacturing Facility to evaluate the health impacts on nearby sensitive receptors. The proposed project consists of the construction and operation of an iron salts manufacturing facility on a property leased from Corteva that would be inside the fenced limits of the Corteva industrial complex in Pittsburg. The project site would include development of the facility, which includes the use of two existing buildings (to be used for an office and laboratory) on a 1.38-acre site. The iron salts made at this facility would ship to California's water treatment and wastewater treatment plants.

The health risk assessment (HRA) focuses on health impacts on existing residences, offsite workers, and educational facilities from emissions of toxic air contaminants (TAC)[1] such as diesel particulate matter (DPM)[2] from diesel equipment and haul truck emissions associated with the project construction activities and operational air toxics emissions from haul trucks, the cooling tower, and the scrubber. The HRA was conducted to determine the health impacts, in terms of excess cancer risk and non-cancer hazards, using the significance levels identified by the Bay Area Air Quality Management District (BAAQMD)'s *CEQA Air Quality Guidelines*.[3] In accordance with the BAAQMD *CEQA Air Quality Guidelines*, the HRA also evaluated concentrations of particulate matter equal to or less than 2.5 micrometers (fine particulate or $PM_{2.5}$ as combustion exhaust and fugitive dust). The HRA was prepared based on the California Office of Environmental Health Hazard Assessment (OEHHA)'s *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments.*[4]

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1 Toxic air contaminants are a broad class of compounds known to cause morbidity or mortality. TAC are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., gasoline service stations, dry cleaners). TAC are typically found in low concentrations, even near their source (e.g., diesel particulate matter near a freeway). Because chronic exposure can result in adverse health effects, TAC are regulated at the regional, state, and federal level.

2 In 1998, the California Air Resources Board classified diesel particulate matter as a toxic air contaminant, citing its potential to cause cancer and other health problems. The US Environmental Protection Agency concluded that long-term exposure to diesel engine exhaust is likely to pose a lung cancer hazard to humans and can also contribute to other acute and chronic health effects.

3 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, April 20, 2023, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

4 Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, February 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

The supporting information, methodology, assumptions, and detailed results associated with this HRA are provided in **Attachment A: Health Risk Assessment Methodology, Assumptions, and Detailed Results** at the end of this narrative.

2.0 PROJECT OVERVIEW

The manufacturing process involves dissolving iron ore and high-purity scrap iron with chlorine and hydrochloric Acid (HCL). These reactions occur in reactors designed for the corrosive nature of this process. The iron salts manufactured at the proposed facility would ship to California's water treatment and wastewater treatment plants.

Trucks would deliver iron ore (magnetite), scrap steel, and spent pickling liquor (SPL or ferrous chloride) to the facility for the raw iron material. The facility would also consume HCL and chlorine, which Pencco would purchase from Corteva or K2. The chlorine would be transported to the facility by pipeline, all within the Corteva industrial complex.

The HCL would be transported to the facility initially by tanker truck and then by pipeline once an HCL pipeline is available. The HCL pipeline from Corteva would extend from the existing line at the rail car spot adjacent to F Street from the east and would require approximately 120 feet of piping to the project tie in point. The facility would also use 98 percent sulfuric acid (H_2SO_4) in iron salts production and liquid oxygen. Both would be transported to the facility by tanker trucks. There would also be a need to consume 50 percent sodium hydroxide (NaOH) in the air scrubber for the facility to control fugitive emissions of HCL and chlorine. NaOH is a corrosive liquid that would also be delivered by tanker truck. Exit the property via Loveridge Road and utilize Highway 4 (primarily heading west).

Construction of the project would occur intermittently over approximately 14 months from May 2025 through July 2026. Construction activities would typically take place Monday through Friday, 8 a.m. to 5 p.m. Construction of the project would require demolition, site preparation, grading, building construction/equipment installation, paving, and architectural coating. Construction would require the export of 16,000 cubic yards of soil to make room for the recessed concrete containment floor. Demolition would consist of removing 27,000 square feet of existing pavement to make room for the new concrete containment area and truck scales. New paving would consist of 26,000 square feet of pavement and 1,000 square feet of asphalt for the new concrete containment area.

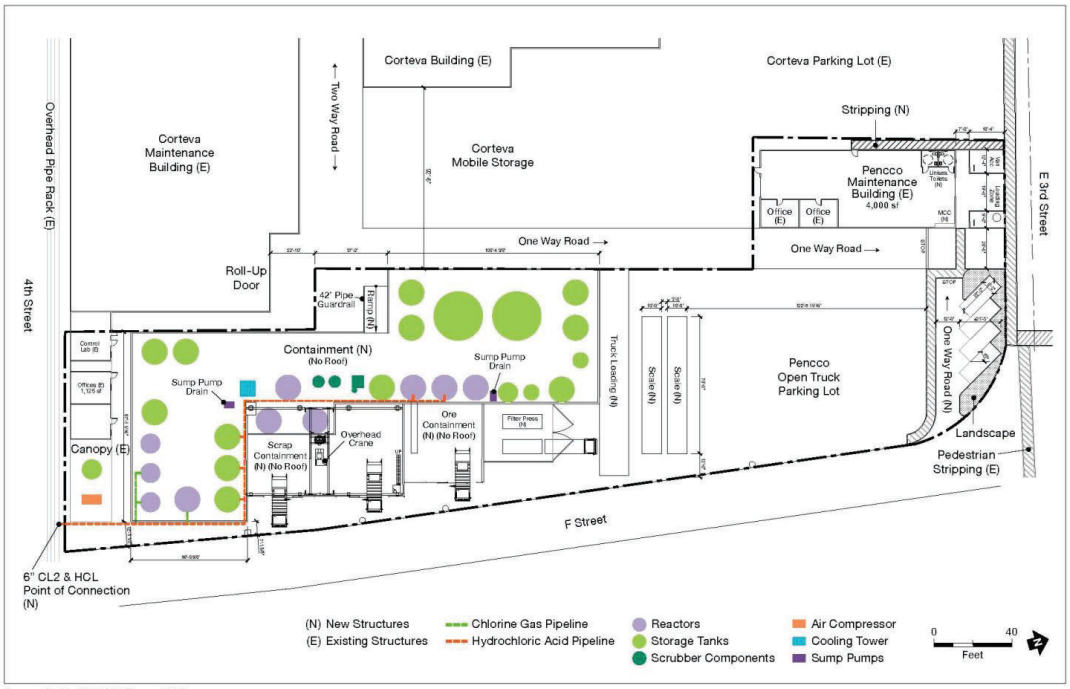
The project site consists of a 1.38-acre (59,960.6 square feet) property leased from Corteva at 901 Loveridge Road in Pittsburg, California. The parcel is zoned General Industrial and is designated Industrial in the City of Pittsburg 2040 General Plan. The project site is fully developed and consists of existing buildings and pavement in the Corteva industrial complex. **Figure 1: Project Location** displays the project location. **Figure 1: Project Site Plan** displays the project site plan including the location of the cooling tower and scrubber stack.

Figure 1
Project Location



Source: RCH Group; Google Earth Pro, 2024

Figure 2
Project Site Plan



Source: Atelier 424, RCH Group, 2024

3.0 HEALTH IMPACT ANALYSIS

Short-term and long-term health impacts related to the construction and operation of the project were evaluated. The analysis focuses on annual emissions from construction and operation of the facility given that health impacts from DPM and other air toxics are evaluated over a year or longer period. Regulatory models used to estimate health impacts include:

- California Air Pollution Officers Association (CAPCOA) CalEEMod (California Emissions Estimator Model Version 2022.1)[5] is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutants and GHG emissions associated with both construction and operations from a variety of land use projects. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use.
- AERMOD (American Meteorological Society/USEPA Regulatory Model, Version 23132) is an atmospheric dispersion model which can simulate point, area, volume, and line emissions sources and has the capability to include simple, intermediate, and complex terrain along with meteorological conditions and multiple receptor locations.[6,7] AERMOD is commonly executed to yield 1-hour maximum and annual average concentrations (in $\mu g/m^3$) at each receptor.

The cooling tower would emit volatile organic compounds (VOC) as reactive organic gases (ROG), particulate matter less than 10 micrometers (coarse particulate or PM_{10}), and chloroform. The PM_{10} emissions are the result of the total dissolved solids in the circulating water which are carried out with the water that is entrained in the air being discharged from the tower. VOC emissions typically result from the leakage from process heat exchangers that service hydrocarbon process streams as well as from chemical treatment with VOC containing material added to the circulating water. VOC emissions are expected from cooling towers used in refineries and chemical plants, where the circulating water is used to cool down the process stream. Chloroform, an air toxic, emissions are typically from the toxic constituents of PM_{10} and/or VOC in the circulating water. USEPA AP-42, Compilation of Air Pollutant Emission Factors (VOC - AP-42, Section 5.1, Table 5.1-2 PM_{10} - AP-42, Section 13.4, Table 13.4-1) was used to estimate the VOC, PM_{10}, and chloroform emission rates. The emission factors have been developed and compiled from source test data, material balance studies, and engineering estimates.[8,9]

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5 California Air Pollution Officers Association, *California Emissions Estimator Model User Guide Version 2022.1*, April 2022, http://www.caleemod.com/

6 US Environmental Protection Agency, Preferred/Recommended Models, *AERMOD Modeling System*, https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models#aermod

7 Title 40 CFR Part 51, *Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions; Final Rule*, https://www.epa.gov/sites/default/files/2020-09/documents/appw_17.pdf

8 US Environmental Protection Agency, AP 42, Compilation of Air Pollutant Emission Factors, Fifth Edition, Volume I, https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors

The HCl emissions from the scrubber were estimated. According to the vendor information, the HCl will be treated by a 2-stage system. The uncontrolled inlet HCl concentration is 20 ppm for the design. At the outlet of the stage 1 scrubber, the HCl concentration would be 0.6 ppm. At the outlet of the stage 2 scrubber, the HCl concentration would be 0.00006 ppm at a flow rate of 12,690 cubic feet per minute (at temperature at 140 F, pressure 28.82 inches of Hg).

The uncontrolled HCL emissions would be 1.42 pounds per hour and 12, 418 pounds per year. The stage 1 HCL emissions (with 97 percent control efficiency) would be 0.04 pounds per hour and 373 pounds per year. The HCl emissions from the Stage 2 outlet (with 99.9 percent control efficiency) would be 0.0000044 pounds per hour 0.038 pounds per year.

Threshold of Significance

The thresholds and methodologies from the BAAQMD's *CEQA Air Quality Guidelines* were used to evaluate the potential health impacts of construction and operation of the project. The thresholds of significance applied to assess project-level air quality impacts are:

- Exposure of persons by siting a new source or a new sensitive receptor to substantial levels of TAC resulting in (a) a cancer risk level greater than 10 in one million, (b) a noncancerous risk (chronic or acute) hazard index greater than 1.0, or (c) an increase of annual average $PM_{2.5}$ of greater than 0.3 micrograms per cubic meter ($\mu g/m^3$). For this threshold, sensitive receptors include residential uses, schools, parks, daycare centers, nursing homes, and medical centers; or

Assessment of a significant cumulative impact if it would result in:

- Exposure of persons, by siting a new source or a new sensitive receptor, to substantial levels of TAC during either construction or operation resulting in (a) a cancer risk level greater than 100 in a million, (b) a noncancer risk (chronic or acute) hazard index greater than 10.0, or (c) annual average $PM_{2.5}$ of greater than 0.8 $\mu g/m^3$.

Health Impact Evaluation

This HRA was conducted following methodologies in OEHHA's *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. This was accomplished by applying the estimated concentrations at the receptors analyzed to the established cancer risk estimates and acceptable reference concentrations for non-cancer health effects.

Recent OEHHA's revisions to its *Guidance Manual* were primarily designed to ensure that the greater sensitivity of children to cancer and other health risks is reflected in HRA. For example, OEHHA now recommends that risks be analyzed separately for multiple age groups, focusing especially on young children and teenagers, rather than the past practice of analyzing risks to the general population, without distinction by age. OEHHA also now recommends that statistical "age sensitivity factors" be incorporated into an HRA, and that children's relatively high breathing rates be accounted for. On the other hand, the *Guidance Manual* revisions also include some changes that would reduce calculated

[9] South Coast Air Quality Management District, Guidelines for Calculating Emissions from Cooling Towers, December 2022, https://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/guidelines-for-calculating-emissions-from-cooling-towers-2022.pdf?sfvrsn=6

health risks. For example, under the former guidance, OEHHA recommended that residential cancer risks be assessed by assuming 70 years of exposure at a residential receptor; under the *Guidance Manual*, this assumption is lessened to 30 years.

Health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Individual cancer risk is the likelihood that a person exposed to air toxic concentrations over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. The maximally exposed individual (MEI) represents the worst–case risk estimate, based on a theoretical person continuously exposed for a lifetime at the point of highest compound concentration in the air. This is a highly conservative assumption since most people do not remain at home all day and on average residents change residences every 11 to 12 years. In addition, this assumption assumes that residents are experiencing outdoor concentrations for the entire exposure period.

This HRA analyzes the cancer risks to sensitive receptors in the vicinity of the project, using emission rates (in pounds per hour and pounds per year) based on CalEEMod. Air toxics emission rates were input into the USEPA's AERMOD atmospheric dispersion model to calculate ambient air concentrations at receptors in the project vicinity. This HRA is intended to provide a worst–case estimate of the increased exposure by employing a standard emission estimation program, an accepted pollutant dispersion model, approved toxicity factors, and conservative exposure parameters.

In accordance with OEHHA *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments,* this HRA was accomplished by applying the highest estimated concentrations of TAC at the receptors analyzed to the established cancer potency factors and acceptable reference concentrations for non-cancer health effects. Increased cancer risks were calculated using the modeled air toxics concentrations and OEHHA-recommended methodologies for both child exposure (3rd trimester through two years of age) and adult exposure. The cancer risk calculations were based on applying the OEHHA-recommended age sensitivity factors and breathing rates, as well as fraction of time at home and an exposure duration of 30 years, to the air toxics concentration exposures. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing air pollutants. The supporting methodology and assumptions used in this HRA are provided in **Attachment A: Health Risk Assessment Methodology, Assumptions, and Detailed Results** at the end of this narrative.

These conservative methodologies tend to overestimate both non-carcinogenic and carcinogenic health risk, possibly by an order of magnitude or more. Therefore, for carcinogenic risks, the actual probabilities of cancer formation in the populations of concern due to exposure to carcinogenic pollutants are likely to be lower than the risks derived using this HRA methodology. The extrapolation of toxicity data in animals to humans, the estimation of concentration prediction methods within dispersion models; and the variability in lifestyles, fitness and other confounding factors of the human population also contribute to the overestimation of health impacts. Therefore, the results of this HRA are highly overstated.

Some receptors are considered more sensitive to air pollutants than others, because of preexisting health problems, proximity to the emissions source, or duration of exposure to air pollutants. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because the very young, the old, and the infirm are more

susceptible to respiratory infections and other air quality-related health problems than the general public. Residential areas are also considered sensitive to poor air quality because people in residential areas are often at home for extended periods. Recreational land users are moderately sensitive to air pollution because of vigorous exercise associated with recreation places having a high demand on respiratory system function.

Modeling locations were placed at offsite worker receptors to estimate health impacts due to proposed project construction and operations. Numerous offsite workers are located within 1,000 feet of the project site. Modeling locations were placed at nearby buildings in which offsite workers would gather, along the facility property line, and within a cartesian grid with spacing of 50 meters from the proposed project. This results in approximately 270 modeling receptors.

Martin Luther King Junior High School is located approximately 1.2 miles to the southwest of the project site. Turner Elementary School is located approximately 1.6 miles to the south of the project site. Antioch Charter Academy is located approximately 2.0 miles to the southeast of the project site. Maria Vista Elementary School is located approximately 1.8 miles to the west of the project site. Little People's Preschool is located approximately 1.1 miles to the southwest of the project site. Modeling receptors were also included for these educational facilities.

The nearest residential land uses (in the area bordered by the Pittsburg-Antioch Highway, Central Addition Park, Manor Street, and the railroad tracks) are located approximately 1.0 miles to the southwest of the project site. There are also residences located to the south of the project site (in an area bordered by California Delta Highway and Leland Street), within approximately 1.2 miles and residences located to the southeast of the project site (in an area bordered by Auto Center Drive, 16th Street, and Crestview Drive), within approximately 1.7 miles. Modeling receptors were also included for these residential land uses. **Attachment A: Health Risk Assessment Methodology, Assumptions, and Detailed Results** provides further details related to the location of modeling receptors.

Construction Health Impacts at Existing Residences

The following describes the HRA results associated with existing residences due to unmitigated project construction activities (i.e., offroad equipment and haul trucks). As shown in **Table 1: Estimated Unmitigated Construction Health Impacts at Existing Residences**, the maximum cancer risk from unmitigated project construction emissions for an existing residence would be 0.13 per million. Thus, the cancer risk due to unmitigated construction activities is less than the BAAQMD threshold of 10 per million and would be less than significant.

Table 1: Estimated Unmitigated Construction Health Impacts at Existing Residences

Source	Cancer Risk (child/adult)	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Proposed Project Construction	0.13/0.01	<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

The following describes the HRA results associated with existing residences due to mitigated project construction activities. As shown in **Table 2: Estimated Mitigated Construction Health Impacts at**

Existing Residences, the maximum cancer risk from mitigated project construction emissions for an existing residence would be 0.02 per million. Thus, the cancer risk due to mitigated construction activities are less than the BAAQMD threshold of 10 per million and would be less than significant.

Table 2: Estimated Mitigated Construction Health Impacts at Existing Residences

Source	Cancer Risk (child/adult)	Hazard Impact	$PM_{2.5}$ Concentration
Mitigated Proposed Project Construction	0.02/<0.01	<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Both acute (short-term) and chronic (long-term) adverse health impacts unrelated to cancer are measured against a hazard index (HI), which is defined as the ratio of the predicted incremental DPM exposure concentration from the project to a reference exposure level (REL) that could cause adverse health effects. The REL are published by OEHHA based on epidemiological research. The ratio (referred to as the Hazard Quotient [HQ]) of each non-carcinogenic substance that affects a certain organ system is added to produce an overall HI for that organ system. The overall HI is calculated for each organ system. The impact is considered to be significant if the overall HI for the highest-impacted organ system is greater than 1.0.

Of note, there are a cancer potency factor and a chronic hazard index, but no acute hazard index associated with DPM.[10] The chronic reference exposure level for DPM was established by the California OEHHA[11] as 5 μg/m^3. Thus, the project-related annual concentration of DPM cannot exceed 5.0 μg/m^3; resulting in a chronic HI of greater than 1.0 (i.e., DPM annual concentration/5.0 μg/m^3). The chronic HI would be less than 0.01 at the existing residences. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant.

Dispersion modeling also estimated the exposure of sensitive receptors to project-related concentrations of $PM_{2.5}$. The BAAQMD *Air Quality Guidelines* requires inclusion of $PM_{2.5}$ exhaust and fugitive dust emissions in this analysis. The project's annual $PM_{2.5}$ concentration from construction activities would be less than 0.01 μg/m^3 at the existing residences. Thus, the annual $PM_{2.5}$ concentration due to project construction (combustion exhaust and fugitive dust) would be below the BAAQMD threshold of 0.3 μg/m^3 and would be considered less than significant.

Construction Health Impacts at Existing Schools

The following describes the HRA results associated with existing schools due to unmitigated project construction activities. As shown in **Table 3: Estimated Unmitigated Construction Health Impacts at Existing Schools**, the maximum cancer risk from unmitigated project construction emissions for existing schools would be 0.01 per million. Thus, the cancer risk due to unmitigated construction activities is less than the BAAQMD threshold of 10 per million and would be less than significant.

10 Office of Environmental Health Hazards Assessment Chemical Database – Air, http://oehha.ca.gov/chemicals

11 California Office of Environmental Health Hazards Assessment - Acute, 8-hour, and Chronic Reference Exposure Levels, June 2014, http://www.oehha.ca.gov/air/allrels.html

Table 3: Estimated Unmitigated Construction Health Impacts at Existing Schools

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Proposed Project Construction	0.01	<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

The following describes the HRA results associated with existing residences due to mitigated project construction activities. As shown in **Table 4: Estimated Mitigated Construction Health Impacts at Existing Schools**, the maximum cancer risk from mitigated project construction emissions for existing schools would be less than 0.01 per million. Thus, the cancer risk due to mitigated construction activities are less than the BAAQMD threshold of 10 per million and would be less than significant.

Table 4: Estimated Mitigated Construction Health Impacts at Existing Schools

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Mitigated Proposed Project Construction	<0.01	<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

The chronic HI would be less than 0.01 at the existing schools. The chronic HI would be less than 0.01 at the existing schools. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant.

The project's annual $PM_{2.5}$ concentration from construction activities would be less than 0.01 µg/m^3 at the existing schools. Thus, the annual $PM_{2.5}$ concentration due to project construction (combustion exhaust and fugitive dust) would be below the BAAQMD threshold of 0.3 µg/m^3 and would be considered less than significant.

Construction Health Impacts at Offsite Workers

The following describes the HRA results associated with existing residences due to unmitigated project construction activities. As shown in **Table 5: Estimated Unmitigated Construction Health Impacts at Offsite Workers**, the maximum cancer risk from unmitigated project construction emissions for offsite workers would be 1.8 per million. The maximum exposed individual worker (MEIW) for construction activities is located to the east of the project site. Thus, the cancer risk due to unmitigated construction activities is less than the BAAQMD threshold of 10 per million and would be less than significant.

Table 5: Estimated Unmitigated Construction Health Impacts at Offsite Workers

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Proposed Project Construction	1.83	0.09	0.80
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	Yes

The following describes the HRA results associated with existing residences due to mitigated project construction activities. As shown in **Table 6: Estimated Mitigated Construction Health Impacts at Offsite Workers**, the maximum cancer risk from mitigated project construction emissions for offsite workers would be 0.24 per million. Thus, the cancer risk due to mitigated construction activities are less than the BAAQMD threshold of 10 per million and would be less than significant.

Table 6: Estimated Mitigated Construction Health Impacts at Offsite Workers

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Mitigated Proposed Project Construction	0.24	0.01	0.21
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

The chronic HI would be 0.01 at offsite workers. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant.

The project's unmitigated annual $PM_{2.5}$ concentration from construction activities would be 0.80 µg/m^3 at offsite workers. Thus, the annual $PM_{2.5}$ concentration due to project construction (combustion exhaust and fugitive dust) would be potentially above the BAAQMD threshold of 0.3 µg/m^3. With **Mitigation Measures AQ-1 and AQ-2**, the project's annual $PM_{2.5}$ concentration from construction activities would be 0.21 µg/m^3 at offsite workers. The MEIW for construction activities is located to the south of the project site along the haul truck route. Thus, the annual $PM_{2.5}$ concentration due to project construction (combustion exhaust and fugitive dust) would be less than the BAAQMD threshold of 0.3 µg/m^3 and less than significant with mitigation.

Mitigation Measure AQ-1: Construction-related activities, such as soil disturbance, grading, and material hauling, can also result in fugitive dust emissions. Based on the most recent BAAQMD's *CEQA Air Quality Guidelines,* for a project to have a less-than-significant air quality impact related to construction-related fugitive dust emissions, the project must implement the following basic best management practices:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the person to contact at the City regarding dust complaints. This person shall respond and take corrective

action within 48 hours. The BAAQMD's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

Mitigation Measure AQ-2: The applicant shall implement the following measures during construction to further reduce construction exhaust emissions:

All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall utilize diesel engines that are USEPA certified "Tier 4 final" emission standards for particulate matter. Prior to the issuance of any demolition/construction permits, the construction contractor shall submit specifications of the equipment to be used during construction and the city of Pittsburg shall confirm this requirement is met.[12]

Equipment such as air compressors, concrete/industrial saws, forklifts, light stands, manlifts, pumps, and welders shall be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators.

Operation Health Impacts at Existing Residences

Project operational sources of air toxics include haul trucks, the cooling tower, and the scrubber. The following describes the HRA results associated with existing residences due to project operation (cooling tower, scrubber, and haul trucks). The maximum cancer risk from operations for a residential receptor would be less than 0.01 per million. Thus, the cancer risk due to operations is less than the BAAQMD threshold of 10 per million and would be less than significant. As shown in **Table 7: Estimated Operational Health Impacts at Existing Residences**, the chronic HI with stage 2 scrubber would be less than 0.01 at the existing residences. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant. The project's annual $PM_{2.5}$ concentration from construction activities would be less than 0.01 $\mu g/m^3$ at the existing residences. Thus, the annual $PM_{2.5}$ concentration due to project operations would be below the BAAQMD threshold of 0.3 $\mu g/m^3$ and would be considered less than significant.

Table 7: Estimated Operational Health Impacts at Existing Residences

Source	Cancer Risk (child/adult)	Hazard Impact (chronic/acute)	$PM_{2.5}$ Concentration
Proposed Project Operation (Uncontrolled Scrubber)	<0.01	0.11/<0.01	<0.01
Proposed Project Operation (Stage 1 Scrubber)	<0.01	<0.01/<0.01	<0.01
Proposed Project Operation (Stage 2 Scrubber)	<0.01	<0.01/<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

[12] USEPA and CARB have implemented regulations and a tiering system to reduce emissions from off-road equipment with increasing combustion efficiency (i.e., decreasing emissions) where Tier 1 is the least efficient (greatest emissions) and Tier 4 is the most efficient (least emissions). The regulations have been implemented over time such that Tier 1 was phased out in the 1990's and Tier 2 was required, followed by implementation of Tier 3 and Tier 4 by 2015 with a phase out of Tier 2.

Operation Health Impacts at Existing Schools

Project operational sources of air toxics include haul trucks, the cooling tower, and the scrubber. The following describes the HRA results associated with existing schools due to project operation. The maximum cancer risk from operations for a school receptor would be less than 0.01 per million. Thus, the cancer risk due to operations is less than the BAAQMD threshold of 10 per million and would be less than significant. As shown in **Table 8: Estimated Operational Health Impacts at Existing Schools**, the chronic HI with stage 2 scrubber would be less than 0.01 at the existing schools. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant. The project's annual $PM_{2.5}$ concentration from operations would be less than 0.01 $\mu g/m^3$ at the existing schools. Thus, the annual $PM_{2.5}$ concentration due to project operation would be below the BAAQMD threshold of 0.3 $\mu g/m^3$ and would be considered less than significant.

Table 8: Estimated Operational Health Impacts at Existing Schools

Source	Cancer Risk (child/adult)	Hazard Impact (chronic/acute)	$PM_{2.5}$ Concentration
Proposed Project Operation (Uncontrolled Scrubber)	<0.01	0.08/<0.01	<0.01
Proposed Project Operation (Stage 1 Scrubber)	<0.01	<0.01/<0.01	<0.01
Proposed Project Operation (Stage 2 Scrubber)	<0.01	<0.01/<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Operation Health Impacts at Offsite Workers

Project operational sources of air toxics include haul trucks, the cooling tower, and the scrubber. The following describes the HRA results associated with offsite workers due to project operation. The maximum cancer risk from operations for an offsite worker receptor would be 0.64 per million. Thus, the cancer risk due to operations is less than the BAAQMD threshold of 10 per million and would be less than significant. As shown in **Table 9: Estimated Operational Health Impacts at Offsite Workers**, the uncontrolled chronic HI would be 12.5 at offsite workers. The uncontrolled chronic HI would be above the project-level threshold of 1 and the impact of the project would therefore be potentially significant. However, the facility and scrubbers would not operate without the use of stage 1 and stage 2 conditions. The chronic HI with stage 1 and 2 would be 0.37 and less than 0.01, respectively, at offsite workers. The chronic HI with stage 1 and 2 would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant. The project's annual $PM_{2.5}$ concentration from operations would be less than 0.04 $\mu g/m^3$ at offsite workers. Thus, the annual $PM_{2.5}$ concentration due to project operation would be below the BAAQMD threshold of 0.3 $\mu g/m^3$ and would be considered less than significant.

Table 9: Estimated Operational Health Impacts at Offsite Workers

Source	Cancer Risk (child/adult)	Hazard Impact (chronic/acute)	$PM_{2.5}$ Concentration
Proposed Project Operation (Uncontrolled Scrubber)	0.64	12.5/0.05	0.04
Proposed Project Operation (Stage 1 Scrubber)	0.64	0.37/<0.01	0.04
Proposed Project Operation (Stage 2 Scrubber)	0.64	<0.01/<0.01	0.04
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Construction plus Operation Health Impacts

The health impacts for construction plus operations at the existing residences and existing schools are well below the BAAQMD thresholds of significance. The maximum cancer risk from project mitigated construction plus operational emissions for offsite workers would be 0.88 per million. Thus, the cancer risk due to operations is less than the BAAQMD threshold of 10 per million and would be less than significant.

4.0 SUMMARY

The health impacts due to construction activities and operations at nearby sensitive receptors would be less than significant with mitigation.

Attachment A - Health Risk Assessment

- **Methodology and Assumptions**
- **Construction Results**
- **Operational Results**
- **AERMOD Data Summary**
- **Cooling Tower Data**
- **Scrubber Data**

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Unmitigated Construction
Receptor:	Existing Residence

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	5.28E-04	9.90E-04	1,090	10.0	0.85	0.07
2	2026	3.83E-04	3.89E-04	1,090	10.0	0.85	0.05
3	2027			745	4.75	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.13	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.01	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of	0<2 Years
0.72	fraction of	2<16 Years
0.73	fraction of	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Mitigated Construction
Receptor:	Existing Residence

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	6.11E-05	2.55E-04	1,090	10.0	0.85	0.01
2	2026	5.91E-05	6.01E-05	1,090	10.0	0.85	0.01
3	2027			745	4.75	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.02	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.00	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Unmitigated Construction
Receptor:	Existing School

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	4.33E-04	8.08E-04	581	3.00	1.00	0.01
2	2026	3.14E-04	3.18E-04	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.01	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Mitigated Construction
Receptor:	Existing School

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	5.02E-05	2.09E-04	581	3.00	1.00	0.00
2	2026	4.85E-05	4.91E-05	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.00	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Unmitigated Construction
Receptor:	Offsite Worker

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	4.30E-01	7.99E-01	230	1.00	1.00	1.06
2	2026	3.11E-01	3.14E-01	230	1.00	1.00	0.77
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.80	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
Yes	Significant?
0.09	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
1.83	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Mitigated Construction
Receptor:	Offsite Worker

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	4.97E-02	2.06E-01	230	1.00	1.00	0.12
2	2026	4.81E-02	4.85E-02	230	1.00	1.00	0.12
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.21	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.24	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Unmitigated Construction Total
Receptor:	Existing Residence

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	6.24E-04	1.81E-03	1,090	10.0	0.85	0.09
2	2026	4.50E-04	9.88E-04	1,090	10.0	0.85	0.06
3	2027			745	4.75	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.15	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.01	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of	0<2 Years
0.72	fraction of	2<16 Years
0.73	fraction of	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Mitigated Construction Total
Receptor:	Existing Residence

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	1.64E-04	1.08E-03	1,090	10.0	0.85	0.02
2	2026	1.30E-04	6.84E-04	1,090	10.0	0.85	0.02
3	2027			745	4.75	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.04	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.00	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Unmitigated Construction Total
Receptor:	Existing School

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	5.14E-04	1.44E-03	581	3.00	1.00	0.01
2	2026	3.70E-04	7.84E-04	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.01	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Mitigated Construction Total
Receptor:	Existing School

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	1.33E-04	8.96E-04	581	3.00	1.00	0.00
2	2026	1.05E-04	5.74E-04	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.00	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Unmitigated Construction Total
Receptor:	Offsite Worker

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	4.33E-01	8.24E-01	230	1.00	1.00	1.07
2	2026	3.14E-01	3.32E-01	230	1.00	1.00	0.78
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.82	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
Yes	Significant?
0.09	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
1.85	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Mitigated Construction Total
Receptor:	Offsite Worker

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	5.29E-02	2.31E-01	230	1.00	1.00	0.13
2	2026	5.03E-02	1.51E-01	230	1.00	1.00	0.12
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.23	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.26	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Construction Trips
Receptor:	Existing Residence

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	1.13E-04	8.90E-04	1,090	10.0	0.85	0.02
2	2026	7.86E-05	6.51E-04	1,090	10.0	0.85	0.01
3	2027			745	4.75	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.03	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.00	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Construction Trips
Receptor:	Existing School

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	9.29E-05	7.33E-04	581	3.00	1.00	0.00
2	2026	6.48E-05	5.36E-04	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.00	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Construction Trips
Receptor:	Offsite Worker

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	2.59E-02	2.04E-01	230	1.00	1.00	0.06
2	2026	1.80E-02	1.49E-01	230	1.00	1.00	0.04
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	
13	2037			230	1.00	1.00	
14	2038			230	1.00	1.00	
15	2039			230	1.00	1.00	
16	2040			230	1.00	1.00	
17	2041			230	1.00	1.00	
18	2042			230	1.00	1.00	
19	2043			230	1.00	1.00	
20	2044			230	1.00	1.00	
21	2045			230	1.00	1.00	
22	2046			230	1.00	1.00	
23	2047			230	1.00	1.00	
24	2048			230	1.00	1.00	
25	2049			230	1.00	1.00	
26	2050			230	1.00	1.00	
27	2051			230	1.00	1.00	
28	2052			230	1.00	1.00	
29	2053			230	1.00	1.00	
30	2054			230	1.00	1.00	

0.20	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.11	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Haul Trucks
Receptor:	Existing Residence

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	3.78E-05	1.70E-04	1,090	10.0	0.85	0.01
2	2026	3.78E-05	1.70E-04	1,090	10.0	0.85	0.01
3	2027	3.78E-05	1.70E-04	745	4.75	0.72	0.00
4	2028	3.78E-05	1.70E-04	745	3.00	0.72	0.00
5	2029	3.78E-05	1.70E-04	745	3.00	0.72	0.00
6	2030	3.78E-05	1.70E-04	745	3.00	0.72	0.00
7	2031	3.78E-05	1.70E-04	745	3.00	0.72	0.00
8	2032	3.78E-05	1.70E-04	745	3.00	0.72	0.00
9	2033	3.78E-05	1.70E-04	745	3.00	0.72	0.00
10	2034	3.78E-05	1.70E-04	745	3.00	0.72	0.00
11	2035	3.78E-05	1.70E-04	745	3.00	0.72	0.00
12	2036	3.78E-05	1.70E-04	745	3.00	0.72	0.00
13	2037	3.78E-05	1.70E-04	745	3.00	0.72	0.00
14	2038	3.78E-05	1.70E-04	745	3.00	0.72	0.00
15	2039	3.78E-05	1.70E-04	745	3.00	0.72	0.00
16	2040	3.78E-05	1.70E-04	745	3.00	0.72	0.00
17	2041	3.78E-05	1.70E-04	335	1.70	0.73	0.00
18	2042	3.78E-05	1.70E-04	335	1.00	0.73	0.00
19	2043	3.78E-05	1.70E-04	335	1.00	0.73	0.00
20	2044	3.78E-05	1.70E-04	335	1.00	0.73	0.00
21	2045	3.78E-05	1.70E-04	335	1.00	0.73	0.00
22	2046	3.78E-05	1.70E-04	335	1.00	0.73	0.00
23	2047	3.78E-05	1.70E-04	335	1.00	0.73	0.00
24	2048	3.78E-05	1.70E-04	335	1.00	0.73	0.00
25	2049	3.78E-05	1.70E-04	335	1.00	0.73	0.00
26	2050	3.78E-05	1.70E-04	335	1.00	0.73	0.00
27	2051	3.78E-05	1.70E-04	335	1.00	0.73	0.00
28	2052	3.78E-05	1.70E-04	335	1.00	0.73	0.00
29	2053	3.78E-05	1.70E-04	335	1.00	0.73	0.00
30	2054	3.78E-05	1.70E-04	335	1.00	0.73	0.00

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.03	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.01	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Haul Trucks
Receptor:	Existing School

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	3.11E-05	1.40E-04	581	3.00	1.00	0.00
2	2026	3.11E-05	1.40E-04	581	3.00	1.00	0.00
3	2027	3.11E-05	1.40E-04	581	3.00	1.00	0.00
4	2028	3.11E-05	1.40E-04	581	3.00	1.00	0.00
5	2029	3.11E-05	1.40E-04	581	3.00	1.00	0.00
6	2030	3.11E-05	1.40E-04	581	3.00	1.00	0.00
7	2031	3.11E-05	1.40E-04	581	3.00	1.00	0.00
8	2032	3.11E-05	1.40E-04	581	3.00	1.00	0.00
9	2033	3.11E-05	1.40E-04	581	3.00	1.00	0.00
10	2034	3.11E-05	1.40E-04	581	3.00	1.00	0.00
11	2035	3.11E-05	1.40E-04	581	3.00	1.00	0.00
12	2036	3.11E-05	1.40E-04	581	3.00	1.00	0.00

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.01	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	8/22/2024
Condition:	Haul Trucks
Receptor:	Offsite Worker

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	8.67E-03	3.90E-02	230	1.00	1.00	0.02
2	2026	8.67E-03	3.90E-02	230	1.00	1.00	0.02
3	2027	8.67E-03	3.90E-02	230	1.00	1.00	0.02
4	2028	8.67E-03	3.90E-02	230	1.00	1.00	0.02
5	2029	8.67E-03	3.90E-02	230	1.00	1.00	0.02
6	2030	8.67E-03	3.90E-02	230	1.00	1.00	0.02
7	2031	8.67E-03	3.90E-02	230	1.00	1.00	0.02
8	2032	8.67E-03	3.90E-02	230	1.00	1.00	0.02
9	2033	8.67E-03	3.90E-02	230	1.00	1.00	0.02
10	2034	8.67E-03	3.90E-02	230	1.00	1.00	0.02
11	2035	8.67E-03	3.90E-02	230	1.00	1.00	0.02
12	2036	8.67E-03	3.90E-02	230	1.00	1.00	0.02
13	2037	8.67E-03	3.90E-02	230	1.00	1.00	0.02
14	2038	8.67E-03	3.90E-02	230	1.00	1.00	0.02
15	2039	8.67E-03	3.90E-02	230	1.00	1.00	0.02
16	2040	8.67E-03	3.90E-02	230	1.00	1.00	0.02
17	2041	8.67E-03	3.90E-02	230	1.00	1.00	0.02
18	2042	8.67E-03	3.90E-02	230	1.00	1.00	0.02
19	2043	8.67E-03	3.90E-02	230	1.00	1.00	0.02
20	2044	8.67E-03	3.90E-02	230	1.00	1.00	0.02
21	2045	8.67E-03	3.90E-02	230	1.00	1.00	0.02
22	2046	8.67E-03	3.90E-02	230	1.00	1.00	0.02
23	2047	8.67E-03	3.90E-02	230	1.00	1.00	0.02
24	2048	8.67E-03	3.90E-02	230	1.00	1.00	0.02
25	2049	8.67E-03	3.90E-02	230	1.00	1.00	0.02
26	2050	8.67E-03	3.90E-02	230	1.00	1.00	0.02
27	2051	8.67E-03	3.90E-02	230	1.00	1.00	0.02
28	2052	8.67E-03	3.90E-02	230	1.00	1.00	0.02
29	2053	8.67E-03	3.90E-02	230	1.00	1.00	0.02
30	2054	8.67E-03	3.90E-02	230	1.00	1.00	0.02

0.04	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.64	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

300	Chronic Reference Exposure Level (ug/m3) for Chloroform	
150	Acute Reference Exposure Level (ug/m3) for Chloroform	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of	0<2 Years
0.72	fraction of	2<16 Years
0.73	fraction of	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	Chloroform
Source:	Cooling Tower

Exposure Year	Calender Year	1-Hour Chloroform Concentration (ug/m3)	Annual Chloroform Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	1.21E-03	7.72E-06	1,090	10.0	0.85	
2	2026	1.21E-03	7.72E-06	1,090	10.0	0.85	
3	2027	1.21E-03	7.72E-06	745	4.75	0.72	
4	2028	1.21E-03	7.72E-06	745	3.00	0.72	
5	2029	1.21E-03	7.72E-06	745	3.00	0.72	
6	2030	1.21E-03	7.72E-06	745	3.00	0.72	
7	2031	1.21E-03	7.72E-06	745	3.00	0.72	
8	2032	1.21E-03	7.72E-06	745	3.00	0.72	
9	2033	1.21E-03	7.72E-06	745	3.00	0.72	
10	2034	1.21E-03	7.72E-06	745	3.00	0.72	
11	2035	1.21E-03	7.72E-06	745	3.00	0.72	
12	2036	1.21E-03	7.72E-06	745	3.00	0.72	
13	2037	1.21E-03	7.72E-06	745	3.00	0.72	
14	2038	1.21E-03	7.72E-06	745	3.00	0.72	
15	2039	1.21E-03	7.72E-06	745	3.00	0.72	
16	2040	1.21E-03	7.72E-06	745	3.00	0.72	
17	2041	1.21E-03	7.72E-06	335	1.70	0.73	
18	2042	1.21E-03	7.72E-06	335	1.00	0.73	
19	2043	1.21E-03	7.72E-06	335	1.00	0.73	
20	2044	1.21E-03	7.72E-06	335	1.00	0.73	
21	2045	1.21E-03	7.72E-06	335	1.00	0.73	
22	2046	1.21E-03	7.72E-06	335	1.00	0.73	
23	2047	1.21E-03	7.72E-06	335	1.00	0.73	
24	2048	1.21E-03	7.72E-06	335	1.00	0.73	
25	2049	1.21E-03	7.72E-06	335	1.00	0.73	
26	2050	1.21E-03	7.72E-06	335	1.00	0.73	
27	2051	1.21E-03	7.72E-06	335	1.00	0.73	
28	2052	1.21E-03	7.72E-06	335	1.00	0.73	
29	2053	1.21E-03	7.72E-06	335	1.00	0.73	
30	2054	1.21E-03	7.72E-06	335	1.00	0.73	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL	
2,100	Acute Reference Exposure Level (ug/m3) for HCL	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of	0<2 Years
0.72	fraction of	2<16 Years
0.73	fraction of	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	HCL-Uncontrolled
Source:	Scrubber

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	4.01E+00	3.45E-02	1,090	10.0	0.85	
2	2026	4.01E+00	3.45E-02	1,090	10.0	0.85	
3	2027	4.01E+00	3.45E-02	745	4.75	0.72	
4	2028	4.01E+00	3.45E-02	745	3.00	0.72	
5	2029	4.01E+00	3.45E-02	745	3.00	0.72	
6	2030	4.01E+00	3.45E-02	745	3.00	0.72	
7	2031	4.01E+00	3.45E-02	745	3.00	0.72	
8	2032	4.01E+00	3.45E-02	745	3.00	0.72	
9	2033	4.01E+00	3.45E-02	745	3.00	0.72	
10	2034	4.01E+00	3.45E-02	745	3.00	0.72	
11	2035	4.01E+00	3.45E-02	745	3.00	0.72	
12	2036	4.01E+00	3.45E-02	745	3.00	0.72	
13	2037	4.01E+00	3.45E-02	745	3.00	0.72	
14	2038	4.01E+00	3.45E-02	745	3.00	0.72	
15	2039	4.01E+00	3.45E-02	745	3.00	0.72	
16	2040	4.01E+00	3.45E-02	745	3.00	0.72	
17	2041	4.01E+00	3.45E-02	335	1.70	0.73	
18	2042	4.01E+00	3.45E-02	335	1.00	0.73	
19	2043	4.01E+00	3.45E-02	335	1.00	0.73	
20	2044	4.01E+00	3.45E-02	335	1.00	0.73	
21	2045	4.01E+00	3.45E-02	335	1.00	0.73	
22	2046	4.01E+00	3.45E-02	335	1.00	0.73	
23	2047	4.01E+00	3.45E-02	335	1.00	0.73	
24	2048	4.01E+00	3.45E-02	335	1.00	0.73	
25	2049	4.01E+00	3.45E-02	335	1.00	0.73	
26	2050	4.01E+00	3.45E-02	335	1.00	0.73	
27	2051	4.01E+00	3.45E-02	335	1.00	0.73	
28	2052	4.01E+00	3.45E-02	335	1.00	0.73	
29	2053	4.01E+00	3.45E-02	335	1.00	0.73	
30	2054	4.01E+00	3.45E-02	335	1.00	0.73	

0.11	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL	
2,100	Acute Reference Exposure Level (ug/m3) for HCL	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of	0<2 Years
0.72	fraction of	2<16 Years
0.73	fraction of	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	HCL-Stage 1
Source:	Scrubber

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	1.20E-01	1.03E-03	1,090	10.0	0.85	
2	2026	1.20E-01	1.03E-03	1,090	10.0	0.85	
3	2027	1.20E-01	1.03E-03	745	4.75	0.72	
4	2028	1.20E-01	1.03E-03	745	3.00	0.72	
5	2029	1.20E-01	1.03E-03	745	3.00	0.72	
6	2030	1.20E-01	1.03E-03	745	3.00	0.72	
7	2031	1.20E-01	1.03E-03	745	3.00	0.72	
8	2032	1.20E-01	1.03E-03	745	3.00	0.72	
9	2033	1.20E-01	1.03E-03	745	3.00	0.72	
10	2034	1.20E-01	1.03E-03	745	3.00	0.72	
11	2035	1.20E-01	1.03E-03	745	3.00	0.72	
12	2036	1.20E-01	1.03E-03	745	3.00	0.72	
13	2037	1.20E-01	1.03E-03	745	3.00	0.72	
14	2038	1.20E-01	1.03E-03	745	3.00	0.72	
15	2039	1.20E-01	1.03E-03	745	3.00	0.72	
16	2040	1.20E-01	1.03E-03	745	3.00	0.72	
17	2041	1.20E-01	1.03E-03	335	1.70	0.73	
18	2042	1.20E-01	1.03E-03	335	1.00	0.73	
19	2043	1.20E-01	1.03E-03	335	1.00	0.73	
20	2044	1.20E-01	1.03E-03	335	1.00	0.73	
21	2045	1.20E-01	1.03E-03	335	1.00	0.73	
22	2046	1.20E-01	1.03E-03	335	1.00	0.73	
23	2047	1.20E-01	1.03E-03	335	1.00	0.73	
24	2048	1.20E-01	1.03E-03	335	1.00	0.73	
25	2049	1.20E-01	1.03E-03	335	1.00	0.73	
26	2050	1.20E-01	1.03E-03	335	1.00	0.73	
27	2051	1.20E-01	1.03E-03	335	1.00	0.73	
28	2052	1.20E-01	1.03E-03	335	1.00	0.73	
29	2053	1.20E-01	1.03E-03	335	1.00	0.73	
30	2054	1.20E-01	1.03E-03	335	1.00	0.73	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL	
2,100	Acute Reference Exposure Level (ug/m3) for HCL	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of	0<2 Years
0.72	fraction of	2<16 Years
0.73	fraction of	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	HCL-Stage 2
Source:	Scrubber

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	1.20E-05	1.03E-07	1,090	10.0	0.85	
2	2026	1.20E-05	1.03E-07	1,090	10.0	0.85	
3	2027	1.20E-05	1.03E-07	745	4.75	0.72	
4	2028	1.20E-05	1.03E-07	745	3.00	0.72	
5	2029	1.20E-05	1.03E-07	745	3.00	0.72	
6	2030	1.20E-05	1.03E-07	745	3.00	0.72	
7	2031	1.20E-05	1.03E-07	745	3.00	0.72	
8	2032	1.20E-05	1.03E-07	745	3.00	0.72	
9	2033	1.20E-05	1.03E-07	745	3.00	0.72	
10	2034	1.20E-05	1.03E-07	745	3.00	0.72	
11	2035	1.20E-05	1.03E-07	745	3.00	0.72	
12	2036	1.20E-05	1.03E-07	745	3.00	0.72	
13	2037	1.20E-05	1.03E-07	745	3.00	0.72	
14	2038	1.20E-05	1.03E-07	745	3.00	0.72	
15	2039	1.20E-05	1.03E-07	745	3.00	0.72	
16	2040	1.20E-05	1.03E-07	745	3.00	0.72	
17	2041	1.20E-05	1.03E-07	335	1.70	0.73	
18	2042	1.20E-05	1.03E-07	335	1.00	0.73	
19	2043	1.20E-05	1.03E-07	335	1.00	0.73	
20	2044	1.20E-05	1.03E-07	335	1.00	0.73	
21	2045	1.20E-05	1.03E-07	335	1.00	0.73	
22	2046	1.20E-05	1.03E-07	335	1.00	0.73	
23	2047	1.20E-05	1.03E-07	335	1.00	0.73	
24	2048	1.20E-05	1.03E-07	335	1.00	0.73	
25	2049	1.20E-05	1.03E-07	335	1.00	0.73	
26	2050	1.20E-05	1.03E-07	335	1.00	0.73	
27	2051	1.20E-05	1.03E-07	335	1.00	0.73	
28	2052	1.20E-05	1.03E-07	335	1.00	0.73	
29	2053	1.20E-05	1.03E-07	335	1.00	0.73	
30	2054	1.20E-05	1.03E-07	335	1.00	0.73	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

300	Chronic Reference Exposure Level (ug/m3) for Chloroform
150	Acute Reference Exposure Level (ug/m3) for Chloroform
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Existing School
Pollutant:	Chloroform
Source:	Cooling Tower

Exposure Year	Calender Year	1-Hour Chloroform Concentration (ug/m3)	Annual Chloroform Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	2.22E-03	5.82E-06	581	3.00	1.00	
2	2026	2.22E-03	5.82E-06	581	3.00	1.00	
3	2027	2.22E-03	5.82E-06	581	3.00	1.00	
4	2028	2.22E-03	5.82E-06	581	3.00	1.00	
5	2029	2.22E-03	5.82E-06	581	3.00	1.00	
6	2030	2.22E-03	5.82E-06	581	3.00	1.00	
7	2031	2.22E-03	5.82E-06	581	3.00	1.00	
8	2032	2.22E-03	5.82E-06	581	3.00	1.00	
9	2033	2.22E-03	5.82E-06	581	3.00	1.00	
10	2034	2.22E-03	5.82E-06	581	3.00	1.00	
11	2035	2.22E-03	5.82E-06	581	3.00	1.00	
12	2036	2.22E-03	5.82E-06	581	3.00	1.00	
13	2037	2.22E-03	5.82E-06	581	3.00	1.00	
14	2038	2.22E-03	5.82E-06	581	3.00	1.00	
15	2039	2.22E-03	5.82E-06	581	3.00	1.00	
16	2040	2.22E-03	5.82E-06	581	3.00	1.00	
17	2041	2.22E-03	5.82E-06	581	3.00	1.00	
18	2042	2.22E-03	5.82E-06	581	3.00	1.00	
19	2043	2.22E-03	5.82E-06	581	3.00	1.00	
20	2044	2.22E-03	5.82E-06	581	3.00	1.00	
21	2045	2.22E-03	5.82E-06	581	3.00	1.00	
22	2046	2.22E-03	5.82E-06	581	3.00	1.00	
23	2047	2.22E-03	5.82E-06	581	3.00	1.00	
24	2048	2.22E-03	5.82E-06	581	3.00	1.00	
25	2049	2.22E-03	5.82E-06	581	3.00	1.00	
26	2050	2.22E-03	5.82E-06	581	3.00	1.00	
27	2051	2.22E-03	5.82E-06	581	3.00	1.00	
28	2052	2.22E-03	5.82E-06	581	3.00	1.00	
29	2053	2.22E-03	5.82E-06	581	3.00	1.00	
30	2054	2.22E-03	5.82E-06	581	3.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Existing School
Pollutant:	HCL-Uncontrolled
Source:	Scrubber

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	3.76E+00	2.27E-02	581	3.00	1.00	
2	2026	3.76E+00	2.27E-02	581	3.00	1.00	
3	2027	3.76E+00	2.27E-02	581	3.00	1.00	
4	2028	3.76E+00	2.27E-02	581	3.00	1.00	
5	2029	3.76E+00	2.27E-02	581	3.00	1.00	
6	2030	3.76E+00	2.27E-02	581	3.00	1.00	
7	2031	3.76E+00	2.27E-02	581	3.00	1.00	
8	2032	3.76E+00	2.27E-02	581	3.00	1.00	
9	2033	3.76E+00	2.27E-02	581	3.00	1.00	
10	2034	3.76E+00	2.27E-02	581	3.00	1.00	
11	2035	3.76E+00	2.27E-02	581	3.00	1.00	
12	2036	3.76E+00	2.27E-02	581	3.00	1.00	
13	2037	3.76E+00	2.27E-02	581	3.00	1.00	
14	2038	3.76E+00	2.27E-02	581	3.00	1.00	
15	2039	3.76E+00	2.27E-02	581	3.00	1.00	
16	2040	3.76E+00	2.27E-02	581	3.00	1.00	
17	2041	3.76E+00	2.27E-02	581	3.00	1.00	
18	2042	3.76E+00	2.27E-02	581	3.00	1.00	
19	2043	3.76E+00	2.27E-02	581	3.00	1.00	
20	2044	3.76E+00	2.27E-02	581	3.00	1.00	
21	2045	3.76E+00	2.27E-02	581	3.00	1.00	
22	2046	3.76E+00	2.27E-02	581	3.00	1.00	
23	2047	3.76E+00	2.27E-02	581	3.00	1.00	
24	2048	3.76E+00	2.27E-02	581	3.00	1.00	
25	2049	3.76E+00	2.27E-02	581	3.00	1.00	
26	2050	3.76E+00	2.27E-02	581	3.00	1.00	
27	2051	3.76E+00	2.27E-02	581	3.00	1.00	
28	2052	3.76E+00	2.27E-02	581	3.00	1.00	
29	2053	3.76E+00	2.27E-02	581	3.00	1.00	
30	2054	3.76E+00	2.27E-02	581	3.00	1.00	

0.08	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Existing School
Pollutant:	HCL-Stage 1
Source:	Scrubber

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	1.13E-01	6.81E-04	581	3.00	1.00	
2	2026	1.13E-01	6.81E-04	581	3.00	1.00	
3	2027	1.13E-01	6.81E-04	581	3.00	1.00	
4	2028	1.13E-01	6.81E-04	581	3.00	1.00	
5	2029	1.13E-01	6.81E-04	581	3.00	1.00	
6	2030	1.13E-01	6.81E-04	581	3.00	1.00	
7	2031	1.13E-01	6.81E-04	581	3.00	1.00	
8	2032	1.13E-01	6.81E-04	581	3.00	1.00	
9	2033	1.13E-01	6.81E-04	581	3.00	1.00	
10	2034	1.13E-01	6.81E-04	581	3.00	1.00	
11	2035	1.13E-01	6.81E-04	581	3.00	1.00	
12	2036	1.13E-01	6.81E-04	581	3.00	1.00	
13	2037	1.13E-01	6.81E-04	581	3.00	1.00	
14	2038	1.13E-01	6.81E-04	581	3.00	1.00	
15	2039	1.13E-01	6.81E-04	581	3.00	1.00	
16	2040	1.13E-01	6.81E-04	581	3.00	1.00	
17	2041	1.13E-01	6.81E-04	581	3.00	1.00	
18	2042	1.13E-01	6.81E-04	581	3.00	1.00	
19	2043	1.13E-01	6.81E-04	581	3.00	1.00	
20	2044	1.13E-01	6.81E-04	581	3.00	1.00	
21	2045	1.13E-01	6.81E-04	581	3.00	1.00	
22	2046	1.13E-01	6.81E-04	581	3.00	1.00	
23	2047	1.13E-01	6.81E-04	581	3.00	1.00	
24	2048	1.13E-01	6.81E-04	581	3.00	1.00	
25	2049	1.13E-01	6.81E-04	581	3.00	1.00	
26	2050	1.13E-01	6.81E-04	581	3.00	1.00	
27	2051	1.13E-01	6.81E-04	581	3.00	1.00	
28	2052	1.13E-01	6.81E-04	581	3.00	1.00	
29	2053	1.13E-01	6.81E-04	581	3.00	1.00	
30	2054	1.13E-01	6.81E-04	581	3.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Existing School
Pollutant:	HCL-Stage 2
Source:	Scrubber

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	1.13E-05	6.81E-08	581	3.00	1.00	
2	2026	1.13E-05	6.81E-08	581	3.00	1.00	
3	2027	1.13E-05	6.81E-08	581	3.00	1.00	
4	2028	1.13E-05	6.81E-08	581	3.00	1.00	
5	2029	1.13E-05	6.81E-08	581	3.00	1.00	
6	2030	1.13E-05	6.81E-08	581	3.00	1.00	
7	2031	1.13E-05	6.81E-08	581	3.00	1.00	
8	2032	1.13E-05	6.81E-08	581	3.00	1.00	
9	2033	1.13E-05	6.81E-08	581	3.00	1.00	
10	2034	1.13E-05	6.81E-08	581	3.00	1.00	
11	2035	1.13E-05	6.81E-08	581	3.00	1.00	
12	2036	1.13E-05	6.81E-08	581	3.00	1.00	
13	2037	1.13E-05	6.81E-08	581	3.00	1.00	
14	2038	1.13E-05	6.81E-08	581	3.00	1.00	
15	2039	1.13E-05	6.81E-08	581	3.00	1.00	
16	2040	1.13E-05	6.81E-08	581	3.00	1.00	
17	2041	1.13E-05	6.81E-08	581	3.00	1.00	
18	2042	1.13E-05	6.81E-08	581	3.00	1.00	
19	2043	1.13E-05	6.81E-08	581	3.00	1.00	
20	2044	1.13E-05	6.81E-08	581	3.00	1.00	
21	2045	1.13E-05	6.81E-08	581	3.00	1.00	
22	2046	1.13E-05	6.81E-08	581	3.00	1.00	
23	2047	1.13E-05	6.81E-08	581	3.00	1.00	
24	2048	1.13E-05	6.81E-08	581	3.00	1.00	
25	2049	1.13E-05	6.81E-08	581	3.00	1.00	
26	2050	1.13E-05	6.81E-08	581	3.00	1.00	
27	2051	1.13E-05	6.81E-08	581	3.00	1.00	
28	2052	1.13E-05	6.81E-08	581	3.00	1.00	
29	2053	1.13E-05	6.81E-08	581	3.00	1.00	
30	2054	1.13E-05	6.81E-08	581	3.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

300	Chronic Reference Exposure Level (ug/m3) for Chloroform
150	Acute Reference Exposure Level (ug/m3) for Chloroform
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	Chloroform
Source:	Cooling Tower

Exposure Year	Calender Year	1-Hour Chloroform Concentration (ug/m3)	Annual Chloroform Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	3.27E-02	5.00E-04	230	1.00	1.00	
2	2026	3.27E-02	5.00E-04	230	1.00	1.00	
3	2027	3.27E-02	5.00E-04	230	1.00	1.00	
4	2028	3.27E-02	5.00E-04	230	1.00	1.00	
5	2029	3.27E-02	5.00E-04	230	1.00	1.00	
6	2030	3.27E-02	5.00E-04	230	1.00	1.00	
7	2031	3.27E-02	5.00E-04	230	1.00	1.00	
8	2032	3.27E-02	5.00E-04	230	1.00	1.00	
9	2033	3.27E-02	5.00E-04	230	1.00	1.00	
10	2034	3.27E-02	5.00E-04	230	1.00	1.00	
11	2035	3.27E-02	5.00E-04	230	1.00	1.00	
12	2036	3.27E-02	5.00E-04	230	1.00	1.00	
13	2037	3.27E-02	5.00E-04	230	1.00	1.00	
14	2038	3.27E-02	5.00E-04	230	1.00	1.00	
15	2039	3.27E-02	5.00E-04	230	1.00	1.00	
16	2040	3.27E-02	5.00E-04	230	1.00	1.00	
17	2041	3.27E-02	5.00E-04	230	1.00	1.00	
18	2042	3.27E-02	5.00E-04	230	1.00	1.00	
19	2043	3.27E-02	5.00E-04	230	1.00	1.00	
20	2044	3.27E-02	5.00E-04	230	1.00	1.00	
21	2045	3.27E-02	5.00E-04	230	1.00	1.00	
22	2046	3.27E-02	5.00E-04	230	1.00	1.00	
23	2047	3.27E-02	5.00E-04	230	1.00	1.00	
24	2048	3.27E-02	5.00E-04	230	1.00	1.00	
25	2049	3.27E-02	5.00E-04	230	1.00	1.00	
26	2050	3.27E-02	5.00E-04	230	1.00	1.00	
27	2051	3.27E-02	5.00E-04	230	1.00	1.00	
28	2052	3.27E-02	5.00E-04	230	1.00	1.00	
29	2053	3.27E-02	5.00E-04	230	1.00	1.00	
30	2054	3.27E-02	5.00E-04	230	1.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	HCL-Uncontrolled
Source:	Scrubber

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	1.01E+02	3.75E+00	230	1.00	1.00	
2	2026	1.01E+02	3.75E+00	230	1.00	1.00	
3	2027	1.01E+02	3.75E+00	230	1.00	1.00	
4	2028	1.01E+02	3.75E+00	230	1.00	1.00	
5	2029	1.01E+02	3.75E+00	230	1.00	1.00	
6	2030	1.01E+02	3.75E+00	230	1.00	1.00	
7	2031	1.01E+02	3.75E+00	230	1.00	1.00	
8	2032	1.01E+02	3.75E+00	230	1.00	1.00	
9	2033	1.01E+02	3.75E+00	230	1.00	1.00	
10	2034	1.01E+02	3.75E+00	230	1.00	1.00	
11	2035	1.01E+02	3.75E+00	230	1.00	1.00	
12	2036	1.01E+02	3.75E+00	230	1.00	1.00	
13	2037	1.01E+02	3.75E+00	230	1.00	1.00	
14	2038	1.01E+02	3.75E+00	230	1.00	1.00	
15	2039	1.01E+02	3.75E+00	230	1.00	1.00	
16	2040	1.01E+02	3.75E+00	230	1.00	1.00	
17	2041	1.01E+02	3.75E+00	230	1.00	1.00	
18	2042	1.01E+02	3.75E+00	230	1.00	1.00	
19	2043	1.01E+02	3.75E+00	230	1.00	1.00	
20	2044	1.01E+02	3.75E+00	230	1.00	1.00	
21	2045	1.01E+02	3.75E+00	230	1.00	1.00	
22	2046	1.01E+02	3.75E+00	230	1.00	1.00	
23	2047	1.01E+02	3.75E+00	230	1.00	1.00	
24	2048	1.01E+02	3.75E+00	230	1.00	1.00	
25	2049	1.01E+02	3.75E+00	230	1.00	1.00	
26	2050	1.01E+02	3.75E+00	230	1.00	1.00	
27	2051	1.01E+02	3.75E+00	230	1.00	1.00	
28	2052	1.01E+02	3.75E+00	230	1.00	1.00	
29	2053	1.01E+02	3.75E+00	230	1.00	1.00	
30	2054	1.01E+02	3.75E+00	230	1.00	1.00	

12.49	Chronic Hazard Impact
1	Significance Threshold
Yes	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.05	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	HCL-Stage 1
Source:	Scrubber

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	3.04E+00	1.12E-01	230	1.00	1.00	
2	2026	3.04E+00	1.12E-01	230	1.00	1.00	
3	2027	3.04E+00	1.12E-01	230	1.00	1.00	
4	2028	3.04E+00	1.12E-01	230	1.00	1.00	
5	2029	3.04E+00	1.12E-01	230	1.00	1.00	
6	2030	3.04E+00	1.12E-01	230	1.00	1.00	
7	2031	3.04E+00	1.12E-01	230	1.00	1.00	
8	2032	3.04E+00	1.12E-01	230	1.00	1.00	
9	2033	3.04E+00	1.12E-01	230	1.00	1.00	
10	2034	3.04E+00	1.12E-01	230	1.00	1.00	
11	2035	3.04E+00	1.12E-01	230	1.00	1.00	
12	2036	3.04E+00	1.12E-01	230	1.00	1.00	
13	2037	3.04E+00	1.12E-01	230	1.00	1.00	
14	2038	3.04E+00	1.12E-01	230	1.00	1.00	
15	2039	3.04E+00	1.12E-01	230	1.00	1.00	
16	2040	3.04E+00	1.12E-01	230	1.00	1.00	
17	2041	3.04E+00	1.12E-01	230	1.00	1.00	
18	2042	3.04E+00	1.12E-01	230	1.00	1.00	
19	2043	3.04E+00	1.12E-01	230	1.00	1.00	
20	2044	3.04E+00	1.12E-01	230	1.00	1.00	
21	2045	3.04E+00	1.12E-01	230	1.00	1.00	
22	2046	3.04E+00	1.12E-01	230	1.00	1.00	
23	2047	3.04E+00	1.12E-01	230	1.00	1.00	
24	2048	3.04E+00	1.12E-01	230	1.00	1.00	
25	2049	3.04E+00	1.12E-01	230	1.00	1.00	
26	2050	3.04E+00	1.12E-01	230	1.00	1.00	
27	2051	3.04E+00	1.12E-01	230	1.00	1.00	
28	2052	3.04E+00	1.12E-01	230	1.00	1.00	
29	2053	3.04E+00	1.12E-01	230	1.00	1.00	
30	2054	3.04E+00	1.12E-01	230	1.00	1.00	

0.37	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	HCL-Stage 2
Source:	Scrubber

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	3.04E-04	1.12E-05	230	1.00	1.00	
2	2026	3.04E-04	1.12E-05	230	1.00	1.00	
3	2027	3.04E-04	1.12E-05	230	1.00	1.00	
4	2028	3.04E-04	1.12E-05	230	1.00	1.00	
5	2029	3.04E-04	1.12E-05	230	1.00	1.00	
6	2030	3.04E-04	1.12E-05	230	1.00	1.00	
7	2031	3.04E-04	1.12E-05	230	1.00	1.00	
8	2032	3.04E-04	1.12E-05	230	1.00	1.00	
9	2033	3.04E-04	1.12E-05	230	1.00	1.00	
10	2034	3.04E-04	1.12E-05	230	1.00	1.00	
11	2035	3.04E-04	1.12E-05	230	1.00	1.00	
12	2036	3.04E-04	1.12E-05	230	1.00	1.00	
13	2037	3.04E-04	1.12E-05	230	1.00	1.00	
14	2038	3.04E-04	1.12E-05	230	1.00	1.00	
15	2039	3.04E-04	1.12E-05	230	1.00	1.00	
16	2040	3.04E-04	1.12E-05	230	1.00	1.00	
17	2041	3.04E-04	1.12E-05	230	1.00	1.00	
18	2042	3.04E-04	1.12E-05	230	1.00	1.00	
19	2043	3.04E-04	1.12E-05	230	1.00	1.00	
20	2044	3.04E-04	1.12E-05	230	1.00	1.00	
21	2045	3.04E-04	1.12E-05	230	1.00	1.00	
22	2046	3.04E-04	1.12E-05	230	1.00	1.00	
23	2047	3.04E-04	1.12E-05	230	1.00	1.00	
24	2048	3.04E-04	1.12E-05	230	1.00	1.00	
25	2049	3.04E-04	1.12E-05	230	1.00	1.00	
26	2050	3.04E-04	1.12E-05	230	1.00	1.00	
27	2051	3.04E-04	1.12E-05	230	1.00	1.00	
28	2052	3.04E-04	1.12E-05	230	1.00	1.00	
29	2053	3.04E-04	1.12E-05	230	1.00	1.00	
30	2054	3.04E-04	1.12E-05	230	1.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Control Pathway

Dispersion Options

Titles

C:\Users\MikeRatte\Documents\Projects\Pittsburg Iron Salts Plant\Air

Dispersion Options

☑ Regulatory Default ☐ Non-Default Options

Dispersion Coefficient

Rural

Output Type

☑ Concentration
☐ Total Deposition (Dry & Wet)
☐ Dry Deposition
☐ Wet Deposition

Plume Depletion

☐ Dry Removal
☐ Wet Removal

Output Warnings

☐ No Output Warnings
☐ Non-fatal Warnings for Non-sequential Met Data

Pollutant / Averaging Time / Terrain Options

Pollutant Type

OTHER - DPM

Averaging Time Options

Hours ☑ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 6 ☐ 8 ☐ 12 ☐ 24

☐ Month ☑ Period ☐ Annual

Exponential Decay

Option not available

Terrain Height Options

☐ Flat ☑ Elevated

SO: Meters
RE: Meters
TG: Meters

Flagpole Receptors

☑ Yes ☐ No

Default Height = 1.80 m

Control Pathway

Optional Files

Re-Start File	Init File	Multi-Year Analyses	Event Input File	Error Listing File
☐	☐	☐	☐	■

Detailed Error Listing File

Filename: AERMOD.err

Source Pathway - Source Inputs

Point Sources

Source Type	Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation (Optional)	Release Height [m]	Emission Rate [g/s]	Gas Exit Temp. [K]	Gas Exit Velocity [m/s]	Stack Inside Diameter [m]
POINT	COOL	600626.27	4209223.83	1.87	3.20	1.00000	308.15	11.30	3.77
POINT	SCRUBBER	600631.20	4209229.04	1.81	6.10	1.00000	333.15	11.60	0.81

Source Pathway - Source Inputs

Polygon Area Sources

Source Type: AREA POLY

Source: DPM

Base Elevation (Optional)	Release Height [m]	Emission Rate [g/ (s-m^2)]	Initial Vertical Dim. [m]	Number of Vertices (or sides)	X Coordinate for Vertices [m]	Y Coordinate for Vertices [m]
1.06	0.93	0.00018	1.26	15	600634.64	4209319.80
		0.00018			600645.68	4209316.49
		0.00018			600647.75	4209322.38
		0.00018			600652.65	4209322.77
		0.00018			600660.87	4209310.70
		0.00018			600663.22	4209305.08
		0.00018			600661.96	4209293.00
		0.00018			600660.02	4209277.75
		0.00018			600658.38	4209261.34
		0.00018			600653.42	4209214.46
		0.00018			600651.24	4209206.14
		0.00018			600642.51	4209174.35
		0.00018			600605.79	4209184.77
		0.00018			600615.97	4209215.90
		0.00018			600603.72	4209219.54

Source Pathway - Source Inputs

Source Type: AREA POLY
Source: PM2.5

Base Elevation (Optional)	Release Height [m]	Emission Rate [g/ (s-m^2)]	Initial Vertical Dim. [m]	Number of Vertices (or sides)	X Coordinate for Vertices [m]	Y Coordinate for Vertices [m]
1.06	0.00	0.00018	0.93	15	600634.64	4209319.80
		0.00018			600645.68	4209316.49
		0.00018			600647.75	4209322.38
		0.00018			600652.65	4209322.77
		0.00018			600660.87	4209310.70
		0.00018			600663.22	4209305.08
		0.00018			600661.96	4209293.00
		0.00018			600660.02	4209277.75
		0.00018			600658.38	4209261.34
		0.00018			600653.42	4209214.46
		0.00018			600651.24	4209206.14
		0.00018			600642.51	4209174.35
		0.00018			600605.79	4209184.77
		0.00018			600615.97	4209215.90
		0.00018			600603.72	4209219.54

Source Pathway - Source Inputs

Line Volume Sources

Source Type: LINE VOLUME

Source: SLINE1

Length of Side [m]	Emission Rate [g/ s]	Building Height [m]	X Coordinate for Points [m]	Y Coordinate for points [m]	Base Elevation [m]	Release Height [m]
3.05	1.00000		600654.41	4209215.29	1.98	0.00
			600597.41	4209003.57	3.00	0.00
			600551.26	4209009.68	3.14	0.00
			600487.48	4208979.82	3.33	0.00
			600439.30	4208995.43	3.13	0.00
			600250.65	4208417.95	7.44	0.00
			600192.29	4208240.84	9.11	0.00
			600163.79	4208196.05	9.94	0.00
			600068.79	4208099.69	10.02	0.00
			599879.76	4207921.82	12.51	0.00
			599777.20	4207862.45	12.68	0.00
			599550.49	4207779.68	14.10	0.00

Source Pathway - Source Inputs

Volume Sources Generated from Line Sources

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000001	600654.01	4209213.82	1.95	0.00	0.00307	3.05		2.84	1.93
	L0000002	600652.43	4209207.93	2.02	0.00	0.00307	3.05		2.84	1.93
	L0000003	600650.84	4209202.04	2.08	0.00	0.00307	3.05		2.84	1.93
	L0000004	600649.26	4209196.16	2.14	0.00	0.00307	3.05		2.84	1.93
	L0000005	600647.67	4209190.27	2.21	0.00	0.00307	3.05		2.84	1.93
	L0000006	600646.09	4209184.39	2.27	0.00	0.00307	3.05		2.84	1.93
	L0000007	600644.50	4209178.50	2.33	0.00	0.00307	3.05		2.84	1.93
	L0000008	600642.92	4209172.61	2.40	0.00	0.00307	3.05		2.84	1.93
	L0000009	600641.33	4209166.73	2.46	0.00	0.00307	3.05		2.84	1.93
	L0000010	600639.75	4209160.84	2.52	0.00	0.00307	3.05		2.84	1.93
	L0000011	600638.17	4209154.95	2.59	0.00	0.00307	3.05		2.84	1.93
	L0000012	600636.58	4209149.07	2.65	0.00	0.00307	3.05		2.84	1.93
	L0000013	600635.00	4209143.18	2.71	0.00	0.00307	3.05		2.84	1.93
	L0000014	600633.41	4209137.29	2.78	0.00	0.00307	3.05		2.84	1.93
	L0000015	600631.83	4209131.41	2.84	0.00	0.00307	3.05		2.84	1.93
	L0000016	600630.24	4209125.52	2.90	0.00	0.00307	3.05		2.84	1.93
	L0000017	600628.66	4209119.64	2.97	0.00	0.00307	3.05		2.84	1.93
	L0000018	600627.07	4209113.75	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000019	600625.49	4209107.86	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000020	600623.90	4209101.98	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000021	600622.32	4209096.09	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000022	600620.73	4209090.20	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000023	600619.15	4209084.32	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000024	600617.56	4209078.43	3.00	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000025	600615.98	4209072.54	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000026	600614.39	4209066.66	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000027	600612.81	4209060.77	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000028	600611.22	4209054.88	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000029	600609.64	4209049.00	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000030	600608.05	4209043.11	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000031	600606.47	4209037.23	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000032	600604.88	4209031.34	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000033	600603.30	4209025.45	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000034	600601.71	4209019.57	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000035	600600.13	4209013.68	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000036	600598.55	4209007.79	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000037	600595.70	4209003.80	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000038	600589.66	4209004.60	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000039	600583.62	4209005.39	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000040	600577.57	4209006.19	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000041	600571.53	4209006.99	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000042	600565.49	4209007.79	3.01	0.00	0.00307	3.05		2.84	1.93
	L0000043	600559.44	4209008.59	3.03	0.00	0.00307	3.05		2.84	1.93
	L0000044	600553.40	4209009.39	3.04	0.00	0.00307	3.05		2.84	1.93
	L0000045	600547.69	4209008.01	3.05	0.00	0.00307	3.05		2.84	1.93
	L0000046	600542.17	4209005.42	3.08	0.00	0.00307	3.05		2.84	1.93
	L0000047	600536.65	4209002.84	3.10	0.00	0.00307	3.05		2.84	1.93
	L0000048	600531.13	4209000.25	3.13	0.00	0.00307	3.05		2.84	1.93
	L0000049	600525.61	4208997.67	3.17	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000050	600520.09	4208995.08	3.21	0.00	0.00307	3.05		2.84	1.93
	L0000051	600514.57	4208992.50	3.25	0.00	0.00307	3.05		2.84	1.93
	L0000052	600509.05	4208989.91	3.30	0.00	0.00307	3.05		2.84	1.93
	L0000053	600503.52	4208987.33	3.35	0.00	0.00307	3.05		2.84	1.93
	L0000054	600498.00	4208984.75	3.41	0.00	0.00307	3.05		2.84	1.93
	L0000055	600492.48	4208982.16	3.44	0.00	0.00307	3.05		2.84	1.93
	L0000056	600486.94	4208979.99	3.46	0.00	0.00307	3.05		2.84	1.93
	L0000057	600481.14	4208981.87	3.44	0.00	0.00307	3.05		2.84	1.93
	L0000058	600475.34	4208983.75	3.42	0.00	0.00307	3.05		2.84	1.93
	L0000059	600469.54	4208985.63	3.40	0.00	0.00307	3.05		2.84	1.93
	L0000060	600463.74	4208987.51	3.37	0.00	0.00307	3.05		2.84	1.93
	L0000061	600457.94	4208989.39	3.35	0.00	0.00307	3.05		2.84	1.93
	L0000062	600452.14	4208991.27	3.33	0.00	0.00307	3.05		2.84	1.93
	L0000063	600446.34	4208993.14	3.31	0.00	0.00307	3.05		2.84	1.93
	L0000064	600440.54	4208995.02	3.29	0.00	0.00307	3.05		2.84	1.93
	L0000065	600437.81	4208990.87	3.33	0.00	0.00307	3.05		2.84	1.93
	L0000066	600435.92	4208985.08	3.40	0.00	0.00307	3.05		2.84	1.93
	L0000067	600434.02	4208979.29	3.46	0.00	0.00307	3.05		2.84	1.93
	L0000068	600432.13	4208973.49	3.52	0.00	0.00307	3.05		2.84	1.93
	L0000069	600430.24	4208967.70	3.58	0.00	0.00307	3.05		2.84	1.93
	L0000070	600428.35	4208961.90	3.65	0.00	0.00307	3.05		2.84	1.93
	L0000071	600426.45	4208956.11	3.71	0.00	0.00307	3.05		2.84	1.93
	L0000072	600424.56	4208950.31	3.77	0.00	0.00307	3.05		2.84	1.93
	L0000073	600422.67	4208944.52	3.83	0.00	0.00307	3.05		2.84	1.93
	L0000074	600420.77	4208938.72	3.90	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000075	600418.88	4208932.93	3.96	0.00	0.00307	3.05		2.84	1.93
	L0000076	600416.99	4208927.13	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000077	600415.09	4208921.34	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000078	600413.20	4208915.54	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000079	600411.31	4208909.75	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000080	600409.42	4208903.95	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000081	600407.52	4208898.16	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000082	600405.63	4208892.37	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000083	600403.74	4208886.57	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000084	600401.84	4208880.78	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000085	600399.95	4208874.98	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000086	600398.06	4208869.19	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000087	600396.16	4208863.39	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000088	600394.27	4208857.60	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000089	600392.38	4208851.80	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000090	600390.49	4208846.01	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000091	600388.59	4208840.21	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000092	600386.70	4208834.42	4.02	0.00	0.00307	3.05		2.84	1.93
	L0000093	600384.81	4208828.62	4.08	0.00	0.00307	3.05		2.84	1.93
	L0000094	600382.91	4208822.83	4.14	0.00	0.00307	3.05		2.84	1.93
	L0000095	600381.02	4208817.04	4.21	0.00	0.00307	3.05		2.84	1.93
	L0000096	600379.13	4208811.24	4.27	0.00	0.00307	3.05		2.84	1.93
	L0000097	600377.24	4208805.45	4.33	0.00	0.00307	3.05		2.84	1.93
	L0000098	600375.34	4208799.65	4.39	0.00	0.00307	3.05		2.84	1.93
	L0000099	600373.45	4208793.86	4.46	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000100	600371.56	4208788.06	4.52	0.00	0.00307	3.05		2.84	1.93
	L0000101	600369.66	4208782.27	4.58	0.00	0.00307	3.05		2.84	1.93
	L0000102	600367.77	4208776.47	4.64	0.00	0.00307	3.05		2.84	1.93
	L0000103	600365.88	4208770.68	4.71	0.00	0.00307	3.05		2.84	1.93
	L0000104	600363.98	4208764.88	4.77	0.00	0.00307	3.05		2.84	1.93
	L0000105	600362.09	4208759.09	4.83	0.00	0.00307	3.05		2.84	1.93
	L0000106	600360.20	4208753.29	4.89	0.00	0.00307	3.05		2.84	1.93
	L0000107	600358.31	4208747.50	4.96	0.00	0.00307	3.05		2.84	1.93
	L0000108	600356.41	4208741.70	5.02	0.00	0.00307	3.05		2.84	1.93
	L0000109	600354.52	4208735.91	5.08	0.00	0.00307	3.05		2.84	1.93
	L0000110	600352.63	4208730.12	5.14	0.00	0.00307	3.05		2.84	1.93
	L0000111	600350.73	4208724.32	5.20	0.00	0.00307	3.05		2.84	1.93
	L0000112	600348.84	4208718.53	5.27	0.00	0.00307	3.05		2.84	1.93
	L0000113	600346.95	4208712.73	5.33	0.00	0.00307	3.05		2.84	1.93
	L0000114	600345.05	4208706.94	5.39	0.00	0.00307	3.05		2.84	1.93
	L0000115	600343.16	4208701.14	5.45	0.00	0.00307	3.05		2.84	1.93
	L0000116	600341.27	4208695.35	5.52	0.00	0.00307	3.05		2.84	1.93
	L0000117	600339.38	4208689.55	5.58	0.00	0.00307	3.05		2.84	1.93
	L0000118	600337.48	4208683.76	5.64	0.00	0.00307	3.05		2.84	1.93
	L0000119	600335.59	4208677.96	5.70	0.00	0.00307	3.05		2.84	1.93
	L0000120	600333.70	4208672.17	5.77	0.00	0.00307	3.05		2.84	1.93
	L0000121	600331.80	4208666.37	5.83	0.00	0.00307	3.05		2.84	1.93
	L0000122	600329.91	4208660.58	5.89	0.00	0.00307	3.05		2.84	1.93
	L0000123	600328.02	4208654.79	5.95	0.00	0.00307	3.05		2.84	1.93
	L0000124	600326.13	4208648.99	6.00	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

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SLINE1	L0000125	600324.23	4208643.20	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000126	600322.34	4208637.40	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000127	600320.45	4208631.61	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000128	600318.55	4208625.81	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000129	600316.66	4208620.02	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000130	600314.77	4208614.22	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000131	600312.87	4208608.43	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000132	600310.98	4208602.63	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000133	600309.09	4208596.84	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000134	600307.20	4208591.04	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000135	600305.30	4208585.25	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000136	600303.41	4208579.45	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000137	600301.52	4208573.66	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000138	600299.62	4208567.87	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000139	600297.73	4208562.07	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000140	600295.84	4208556.28	6.01	0.00	0.00307	3.05		2.84	1.93
	L0000141	600293.94	4208550.48	6.08	0.00	0.00307	3.05		2.84	1.93
	L0000142	600292.05	4208544.69	6.14	0.00	0.00307	3.05		2.84	1.93
	L0000143	600290.16	4208538.89	6.20	0.00	0.00307	3.05		2.84	1.93
	L0000144	600288.27	4208533.10	6.26	0.00	0.00307	3.05		2.84	1.93
	L0000145	600286.37	4208527.30	6.33	0.00	0.00307	3.05		2.84	1.93
	L0000146	600284.48	4208521.51	6.39	0.00	0.00307	3.05		2.84	1.93
	L0000147	600282.59	4208515.71	6.47	0.00	0.00307	3.05		2.84	1.93
	L0000148	600280.69	4208509.92	6.54	0.00	0.00307	3.05		2.84	1.93
	L0000149	600278.80	4208504.12	6.61	0.00	0.00307	3.05		2.84	1.93

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SLINE1	L0000150	600276.91	4208498.33	6.68	0.00	0.00307	3.05		2.84	1.93
	L0000151	600275.02	4208492.54	6.74	0.00	0.00307	3.05		2.84	1.93
	L0000152	600273.12	4208486.74	6.80	0.00	0.00307	3.05		2.84	1.93
	L0000153	600271.23	4208480.95	6.86	0.00	0.00307	3.05		2.84	1.93
	L0000154	600269.34	4208475.15	6.91	0.00	0.00307	3.05		2.84	1.93
	L0000155	600267.44	4208469.36	6.96	0.00	0.00307	3.05		2.84	1.93
	L0000156	600265.55	4208463.56	7.01	0.00	0.00307	3.05		2.84	1.93
	L0000157	600263.66	4208457.77	7.08	0.00	0.00307	3.05		2.84	1.93
	L0000158	600261.76	4208451.97	7.14	0.00	0.00307	3.05		2.84	1.93
	L0000159	600259.87	4208446.18	7.20	0.00	0.00307	3.05		2.84	1.93
	L0000160	600257.98	4208440.38	7.26	0.00	0.00307	3.05		2.84	1.93
	L0000161	600256.09	4208434.59	7.33	0.00	0.00307	3.05		2.84	1.93
	L0000162	600254.19	4208428.79	7.39	0.00	0.00307	3.05		2.84	1.93
	L0000163	600252.30	4208423.00	7.45	0.00	0.00307	3.05		2.84	1.93
	L0000164	600250.40	4208417.21	7.51	0.00	0.00307	3.05		2.84	1.93
	L0000165	600248.50	4208411.42	7.57	0.00	0.00307	3.05		2.84	1.93
	L0000166	600246.59	4208405.63	7.64	0.00	0.00307	3.05		2.84	1.93
	L0000167	600244.68	4208399.84	7.70	0.00	0.00307	3.05		2.84	1.93
	L0000168	600242.77	4208394.05	7.76	0.00	0.00307	3.05		2.84	1.93
	L0000169	600240.87	4208388.26	7.82	0.00	0.00307	3.05		2.84	1.93
	L0000170	600238.96	4208382.47	7.89	0.00	0.00307	3.05		2.84	1.93
	L0000171	600237.05	4208376.68	7.95	0.00	0.00307	3.05		2.84	1.93
	L0000172	600235.14	4208370.89	8.01	0.00	0.00307	3.05		2.84	1.93
	L0000173	600233.23	4208365.10	8.05	0.00	0.00307	3.05		2.84	1.93
	L0000174	600231.33	4208359.31	8.10	0.00	0.00307	3.05		2.84	1.93

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SLINE1	L0000175	600229.42	4208353.52	8.15	0.00	0.00307	3.05		2.84	1.93
	L0000176	600227.51	4208347.73	8.21	0.00	0.00307	3.05		2.84	1.93
	L0000177	600225.60	4208341.94	8.27	0.00	0.00307	3.05		2.84	1.93
	L0000178	600223.70	4208336.15	8.33	0.00	0.00307	3.05		2.84	1.93
	L0000179	600221.79	4208330.36	8.40	0.00	0.00307	3.05		2.84	1.93
	L0000180	600219.88	4208324.57	8.47	0.00	0.00307	3.05		2.84	1.93
	L0000181	600217.97	4208318.78	8.54	0.00	0.00307	3.05		2.84	1.93
	L0000182	600216.07	4208312.99	8.62	0.00	0.00307	3.05		2.84	1.93
	L0000183	600214.16	4208307.20	8.69	0.00	0.00307	3.05		2.84	1.93
	L0000184	600212.25	4208301.41	8.76	0.00	0.00307	3.05		2.84	1.93
	L0000185	600210.34	4208295.62	8.82	0.00	0.00307	3.05		2.84	1.93
	L0000186	600208.43	4208289.83	8.88	0.00	0.00307	3.05		2.84	1.93
	L0000187	600206.53	4208284.04	8.95	0.00	0.00307	3.05		2.84	1.93
	L0000188	600204.62	4208278.25	9.00	0.00	0.00307	3.05		2.84	1.93
	L0000189	600202.71	4208272.46	9.01	0.00	0.00307	3.05		2.84	1.93
	L0000190	600200.80	4208266.67	9.02	0.00	0.00307	3.05		2.84	1.93
	L0000191	600198.90	4208260.88	9.04	0.00	0.00307	3.05		2.84	1.93
	L0000192	600196.99	4208255.09	9.06	0.00	0.00307	3.05		2.84	1.93
	L0000193	600195.08	4208249.30	9.09	0.00	0.00307	3.05		2.84	1.93
	L0000194	600193.17	4208243.51	9.11	0.00	0.00307	3.05		2.84	1.93
	L0000195	600190.53	4208238.07	9.15	0.00	0.00307	3.05		2.84	1.93
	L0000196	600187.26	4208232.93	9.19	0.00	0.00307	3.05		2.84	1.93
	L0000197	600183.98	4208227.78	9.23	0.00	0.00307	3.05		2.84	1.93
	L0000198	600180.71	4208222.64	9.28	0.00	0.00307	3.05		2.84	1.93
	L0000199	600177.44	4208217.50	9.34	0.00	0.00307	3.05		2.84	1.93

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SLINE1	L0000200	600174.17	4208212.35	9.40	0.00	0.00307	3.05		2.84	1.93
	L0000201	600170.89	4208207.21	9.47	0.00	0.00307	3.05		2.84	1.93
	L0000202	600167.62	4208202.07	9.54	0.00	0.00307	3.05		2.84	1.93
	L0000203	600164.35	4208196.93	9.61	0.00	0.00307	3.05		2.84	1.93
	L0000204	600160.24	4208192.45	9.70	0.00	0.00307	3.05		2.84	1.93
	L0000205	600155.96	4208188.11	9.79	0.00	0.00307	3.05		2.84	1.93
	L0000206	600151.68	4208183.77	9.87	0.00	0.00307	3.05		2.84	1.93
	L0000207	600147.40	4208179.43	9.93	0.00	0.00307	3.05		2.84	1.93
	L0000208	600143.12	4208175.08	9.99	0.00	0.00307	3.05		2.84	1.93
	L0000209	600138.84	4208170.74	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000210	600134.56	4208166.40	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000211	600130.28	4208162.06	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000212	600126.00	4208157.72	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000213	600121.72	4208153.38	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000214	600117.44	4208149.04	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000215	600113.16	4208144.70	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000216	600108.88	4208140.36	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000217	600104.60	4208136.02	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000218	600100.32	4208131.67	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000219	600096.04	4208127.33	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000220	600091.76	4208122.99	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000221	600087.48	4208118.65	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000222	600083.20	4208114.31	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000223	600078.92	4208109.97	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000224	600074.64	4208105.63	10.00	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000225	600070.36	4208101.29	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000226	600065.98	4208097.05	10.05	0.00	0.00307	3.05		2.84	1.93
	L0000227	600061.54	4208092.87	10.12	0.00	0.00307	3.05		2.84	1.93
	L0000228	600057.10	4208088.70	10.22	0.00	0.00307	3.05		2.84	1.93
	L0000229	600052.66	4208084.52	10.32	0.00	0.00307	3.05		2.84	1.93
	L0000230	600048.22	4208080.34	10.43	0.00	0.00307	3.05		2.84	1.93
	L0000231	600043.78	4208076.16	10.54	0.00	0.00307	3.05		2.84	1.93
	L0000232	600039.34	4208071.99	10.64	0.00	0.00307	3.05		2.84	1.93
	L0000233	600034.90	4208067.81	10.75	0.00	0.00307	3.05		2.84	1.93
	L0000234	600030.47	4208063.63	10.85	0.00	0.00307	3.05		2.84	1.93
	L0000235	600026.03	4208059.45	10.96	0.00	0.00307	3.05		2.84	1.93
	L0000236	600021.59	4208055.28	11.07	0.00	0.00307	3.05		2.84	1.93
	L0000237	600017.15	4208051.10	11.17	0.00	0.00307	3.05		2.84	1.93
	L0000238	600012.71	4208046.92	11.28	0.00	0.00307	3.05		2.84	1.93
	L0000239	600008.27	4208042.74	11.38	0.00	0.00307	3.05		2.84	1.93
	L0000240	600003.83	4208038.57	11.49	0.00	0.00307	3.05		2.84	1.93
	L0000241	599999.39	4208034.39	11.60	0.00	0.00307	3.05		2.84	1.93
	L0000242	599994.95	4208030.21	11.66	0.00	0.00307	3.05		2.84	1.93
	L0000243	599990.51	4208026.03	11.71	0.00	0.00307	3.05		2.84	1.93
	L0000244	599986.07	4208021.86	11.75	0.00	0.00307	3.05		2.84	1.93
	L0000245	599981.63	4208017.68	11.80	0.00	0.00307	3.05		2.84	1.93
	L0000246	599977.19	4208013.50	11.84	0.00	0.00307	3.05		2.84	1.93
	L0000247	599972.75	4208009.32	11.89	0.00	0.00307	3.05		2.84	1.93
	L0000248	599968.31	4208005.15	11.93	0.00	0.00307	3.05		2.84	1.93
	L0000249	599963.87	4208000.97	11.98	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000250	599959.43	4207996.79	12.01	0.00	0.00307	3.05		2.84	1.93
	L0000251	599954.99	4207992.61	12.04	0.00	0.00307	3.05		2.84	1.93
	L0000252	599950.55	4207988.44	12.07	0.00	0.00307	3.05		2.84	1.93
	L0000253	599946.11	4207984.26	12.11	0.00	0.00307	3.05		2.84	1.93
	L0000254	599941.67	4207980.08	12.15	0.00	0.00307	3.05		2.84	1.93
	L0000255	599937.23	4207975.91	12.20	0.00	0.00307	3.05		2.84	1.93
	L0000256	599932.79	4207971.73	12.26	0.00	0.00307	3.05		2.84	1.93
	L0000257	599928.35	4207967.55	12.32	0.00	0.00307	3.05		2.84	1.93
	L0000258	599923.91	4207963.37	12.36	0.00	0.00307	3.05		2.84	1.93
	L0000259	599919.47	4207959.20	12.34	0.00	0.00307	3.05		2.84	1.93
	L0000260	599915.03	4207955.02	12.32	0.00	0.00307	3.05		2.84	1.93
	L0000261	599910.59	4207950.84	12.31	0.00	0.00307	3.05		2.84	1.93
	L0000262	599906.15	4207946.66	12.29	0.00	0.00307	3.05		2.84	1.93
	L0000263	599901.72	4207942.49	12.27	0.00	0.00307	3.05		2.84	1.93
	L0000264	599897.28	4207938.31	12.26	0.00	0.00307	3.05		2.84	1.93
	L0000265	599892.84	4207934.13	12.24	0.00	0.00307	3.05		2.84	1.93
	L0000266	599888.40	4207929.95	12.22	0.00	0.00307	3.05		2.84	1.93
	L0000267	599883.96	4207925.78	12.20	0.00	0.00307	3.05		2.84	1.93
	L0000268	599879.47	4207921.66	12.19	0.00	0.00307	3.05		2.84	1.93
	L0000269	599874.20	4207918.60	12.15	0.00	0.00307	3.05		2.84	1.93
	L0000270	599868.92	4207915.55	12.11	0.00	0.00307	3.05		2.84	1.93
	L0000271	599863.65	4207912.50	12.07	0.00	0.00307	3.05		2.84	1.93
	L0000272	599858.37	4207909.44	12.03	0.00	0.00307	3.05		2.84	1.93
	L0000273	599853.09	4207906.39	11.99	0.00	0.00307	3.05		2.84	1.93
	L0000274	599847.82	4207903.33	12.03	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000275	599842.54	4207900.28	12.10	0.00	0.00307	3.05		2.84	1.93
	L0000276	599837.27	4207897.22	12.16	0.00	0.00307	3.05		2.84	1.93
	L0000277	599831.99	4207894.17	12.23	0.00	0.00307	3.05		2.84	1.93
	L0000278	599826.72	4207891.12	12.29	0.00	0.00307	3.05		2.84	1.93
	L0000279	599821.44	4207888.06	12.35	0.00	0.00307	3.05		2.84	1.93
	L0000280	599816.16	4207885.01	12.42	0.00	0.00307	3.05		2.84	1.93
	L0000281	599810.89	4207881.95	12.48	0.00	0.00307	3.05		2.84	1.93
	L0000282	599805.61	4207878.90	12.55	0.00	0.00307	3.05		2.84	1.93
	L0000283	599800.34	4207875.84	12.61	0.00	0.00307	3.05		2.84	1.93
	L0000284	599795.06	4207872.79	12.68	0.00	0.00307	3.05		2.84	1.93
	L0000285	599789.79	4207869.74	12.74	0.00	0.00307	3.05		2.84	1.93
	L0000286	599784.51	4207866.68	12.81	0.00	0.00307	3.05		2.84	1.93
	L0000287	599779.23	4207863.63	12.87	0.00	0.00307	3.05		2.84	1.93
	L0000288	599773.68	4207861.16	12.92	0.00	0.00307	3.05		2.84	1.93
	L0000289	599767.96	4207859.07	12.97	0.00	0.00307	3.05		2.84	1.93
	L0000290	599762.23	4207856.98	13.01	0.00	0.00307	3.05		2.84	1.93
	L0000291	599756.50	4207854.89	13.05	0.00	0.00307	3.05		2.84	1.93
	L0000292	599750.78	4207852.80	13.10	0.00	0.00307	3.05		2.84	1.93
	L0000293	599745.05	4207850.71	13.14	0.00	0.00307	3.05		2.84	1.93
	L0000294	599739.32	4207848.62	13.19	0.00	0.00307	3.05		2.84	1.93
	L0000295	599733.60	4207846.53	13.23	0.00	0.00307	3.05		2.84	1.93
	L0000296	599727.87	4207844.44	13.27	0.00	0.00307	3.05		2.84	1.93
	L0000297	599722.15	4207842.35	13.32	0.00	0.00307	3.05		2.84	1.93
	L0000298	599716.42	4207840.26	13.36	0.00	0.00307	3.05		2.84	1.93
	L0000299	599710.69	4207838.17	13.40	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000300	599704.97	4207836.08	13.46	0.00	0.00307	3.05		2.84	1.93
	L0000301	599699.24	4207833.99	13.52	0.00	0.00307	3.05		2.84	1.93
	L0000302	599693.51	4207831.90	13.58	0.00	0.00307	3.05		2.84	1.93
	L0000303	599687.79	4207829.81	13.64	0.00	0.00307	3.05		2.84	1.93
	L0000304	599682.06	4207827.72	13.69	0.00	0.00307	3.05		2.84	1.93
	L0000305	599676.34	4207825.62	13.74	0.00	0.00307	3.05		2.84	1.93
	L0000306	599670.61	4207823.53	13.78	0.00	0.00307	3.05		2.84	1.93
	L0000307	599664.88	4207821.44	13.83	0.00	0.00307	3.05		2.84	1.93
	L0000308	599659.16	4207819.35	13.86	0.00	0.00307	3.05		2.84	1.93
	L0000309	599653.43	4207817.26	13.90	0.00	0.00307	3.05		2.84	1.93
	L0000310	599647.70	4207815.17	13.93	0.00	0.00307	3.05		2.84	1.93
	L0000311	599641.98	4207813.08	13.96	0.00	0.00307	3.05		2.84	1.93
	L0000312	599636.25	4207810.99	13.99	0.00	0.00307	3.05		2.84	1.93
	L0000313	599630.52	4207808.90	14.01	0.00	0.00307	3.05		2.84	1.93
	L0000314	599624.80	4207806.81	14.03	0.00	0.00307	3.05		2.84	1.93
	L0000315	599619.07	4207804.72	14.05	0.00	0.00307	3.05		2.84	1.93
	L0000316	599613.35	4207802.63	14.07	0.00	0.00307	3.05		2.84	1.93
	L0000317	599607.62	4207800.54	14.10	0.00	0.00307	3.05		2.84	1.93
	L0000318	599601.89	4207798.45	14.12	0.00	0.00307	3.05		2.84	1.93
	L0000319	599596.17	4207796.36	14.14	0.00	0.00307	3.05		2.84	1.93
	L0000320	599590.44	4207794.27	14.16	0.00	0.00307	3.05		2.84	1.93
	L0000321	599584.71	4207792.18	14.18	0.00	0.00307	3.05		2.84	1.93
	L0000322	599578.99	4207790.09	14.20	0.00	0.00307	3.05		2.84	1.93
	L0000323	599573.26	4207787.99	14.23	0.00	0.00307	3.05		2.84	1.93
	L0000324	599567.54	4207785.90	14.25	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000325	599561.81	4207783.81	14.27	0.00	0.00307	3.05		2.84	1.93
	L0000326	599556.08	4207781.72	14.24	0.00	0.00307	3.05		2.84	1.93

Building Downwash Information

Source ID: COOL

Heights [m] (10 to 360 deg)

10-60 deg	10.67	10.67	10.67	10.67	10.67	10.67
70-120 deg	10.67	10.67	10.67	10.67	10.67	10.67
130-180 deg	10.67	10.67	0.00	10.67	10.67	10.67
190-240 deg	10.67	10.67	10.67	10.67	10.67	10.67
250-300 deg	10.67	10.67	10.67	10.67	10.67	10.67
310-360 deg	10.67	10.67	0.00	10.67	10.67	10.67

Widths [m] (10 to 360 deg)

10-60 deg	106.38	108.38	110.89	110.03	105.83	98.41
70-120 deg	88.00	74.92	59.56	45.63	85.71	89.18
130-180 deg	89.94	87.97	0.00	91.04	99.22	104.39
190-240 deg	106.38	108.38	110.89	110.03	105.83	98.41
250-300 deg	88.00	74.92	59.56	45.63	85.71	89.18
310-360 deg	89.94	87.97	0.00	91.04	99.22	104.39

Lengths [m] (10 to 360 deg)

10-60 deg	45.63	40.46	48.93	59.61	68.48	80.09
70-120 deg	91.04	99.22	104.39	106.38	111.19	122.58
130-180 deg	130.24	133.95	0.00	88.00	74.92	59.56
190-240 deg	45.63	40.46	48.93	59.61	68.48	80.09
250-300 deg	91.04	99.22	104.39	106.38	111.19	122.58
310-360 deg	130.24	133.95	0.00	88.00	74.92	59.56

Along Flow [m] (10 to 360 deg)

10-60 deg	-44.50	-48.35	-61.56	-72.90	-82.03	-88.66
70-120 deg	-92.60	-93.73	-92.01	-87.49	-85.45	-90.18
130-180 deg	-92.16	-91.34	0.00	-40.32	-26.85	-12.56
190-240 deg	-1.13	7.89	12.63	13.29	13.55	8.57
250-300 deg	1.56	-5.49	-12.38	-18.89	-25.74	-32.40
310-360 deg	-38.09	-42.61	0.00	-47.68	-48.07	-47.00

Across Flow [m] (10 to 360 deg)

10-60 deg	34.30	28.46	23.04	16.93	10.30	3.36
70-120 deg	-3.68	-10.61	-17.22	-21.68	-5.49	-16.97
130-180 deg	-27.93	-38.04	0.00	-47.08	-44.12	-39.81
190-240 deg	-34.30	-28.46	-23.04	-16.93	-10.30	-3.36
250-300 deg	3.68	10.61	17.22	21.68	5.49	16.97
310-360 deg	27.93	38.04	0.00	47.08	44.12	39.81

Source ID: SCRUBBER

Heights [m] (10 to 360 deg)

10-60 deg	10.67	10.67	10.67	10.67	10.67	10.67

70-120 deg	10.67	10.67	10.67	10.67	10.67	10.67
130-180 deg	10.67	10.67	0.00	0.00	10.67	10.67
190-240 deg	10.67	10.67	10.67	10.67	10.67	10.67
250-300 deg	10.67	10.67	10.67	10.67	10.67	10.67
310-360 deg	10.67	10.67	0.00	0.00	10.67	10.67
Widths [m] (10 to 360 deg)						
10-60 deg	106.38	108.38	110.89	110.03	105.83	98.41
70-120 deg	88.00	74.92	59.56	45.63	85.71	89.18
130-180 deg	89.94	87.97	0.00	0.00	99.22	104.39
190-240 deg	106.38	108.38	110.89	110.03	105.83	98.41
250-300 deg	88.00	74.92	59.56	45.63	85.71	89.18
310-360 deg	89.94	87.97	0.00	0.00	99.22	104.39
Lengths [m] (10 to 360 deg)						
10-60 deg	45.63	40.46	48.93	59.61	68.48	80.09
70-120 deg	91.04	99.22	104.39	106.38	111.19	122.58
130-180 deg	130.24	133.95	0.00	0.00	74.92	59.56
190-240 deg	45.63	40.46	48.93	59.61	68.48	80.09
250-300 deg	91.04	99.22	104.39	106.38	111.19	122.58
310-360 deg	130.24	133.95	0.00	0.00	74.92	59.56
Along Flow [m] (10 to 360 deg)						
10-60 deg	-50.49	-54.93	-68.54	-80.06	-89.15	-95.54
70-120 deg	-99.02	-99.49	-96.94	-91.44	-88.30	-91.84
130-180 deg	-92.59	-90.52	0.00	0.00	-22.57	-7.35
190-240 deg	4.85	14.47	19.61	20.45	20.67	15.44
250-300 deg	7.98	0.27	-7.45	-14.94	-22.88	-30.74
310-360 deg	-37.66	-43.43	0.00	0.00	-52.35	-52.21
Across Flow [m] (10 to 360 deg)						
10-60 deg	38.25	31.31	24.71	17.36	9.48	1.32
70-120 deg	-6.89	-14.89	-22.43	-27.67	-12.07	-23.95
130-180 deg	-35.09	-45.17	0.00	0.00	-49.88	-44.74
190-240 deg	-38.25	-31.31	-24.71	-17.36	-9.48	-1.32
250-300 deg	6.89	14.89	22.43	27.67	12.07	23.95
310-360 deg	35.09	45.17	0.00	0.00	49.88	44.74

Emission Rate Units for Output

For Concentration

Unit Factor:	1E6
Emission Unit Label:	GRAMS/SEC
Concentration Unit Label:	MICROGRAMS/M**3

Source Groups

Source Group ID:	List of Sources in Group (Source Range or Single Sources)
SLINE1	SLINE1
SCRUBBER	SCRUBBER
PM2.5	PM2.5
DPM	DPM
COOL	COOL

Variable Emissions

Hour / Day-of-Week Emission Rate Variation

Scenario: Scenario 1

Source ID: DPM

Hour	Mon	Tues	Wed	Thr	Fri	Sat	Sun
1:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
10:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
11:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
12:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
13:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
14:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
15:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
16:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
17:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
18:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Source ID: PM2.5

Hour	Mon	Tues	Wed	Thr	Fri	Sat	Sun
1:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
10:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
11:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
12:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
13:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
14:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
15:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
16:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
17:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
18:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Source Pathway

Scenario: Scenario 1

Source ID: **SLINE1**

Hour	Mon	Tues	Wed	Thr	Fri	Sat	Sun
1:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
10:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
11:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
12:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
13:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
14:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
15:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
16:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
17:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
18:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Scenario: Scenario 2

Source ID: **COOL**

Hour	Mon	Tues	Wed	Thr	Fri	Sat	Sun
1:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
2:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
3:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
4:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
5:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
6:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
7:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
8:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
9:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
10:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
11:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
12:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
13:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
14:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
15:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
16:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
17:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
18:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
19:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
20:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
21:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
22:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
23:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
24:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00

Receptor Pathway

Receptor Networks

Note: Terrain Elavations and Flagpole Heights for Network Grids are in Page RE2 - 1 (If applicable)
Generated Discrete Receptors for Multi-Tier (Risk) Grid and Receptor Locations for Fenceline Grid are in Page RE3 - 1 (If applicable)

Discrete Receptors

Discrete Cartesian Receptors

Record Number	X-Coordinate [m]	Y-Coordinate [m]	Group Name (Optional)	Terrain Elevations	Flagpole Heights [m] (Optional)
1	600334.96	4209343.71	Worker	1.51	
2	600357.01	4209387.80	Worker	1.03	
3	600442.05	4209457.09	Worker	1.00	
4	600544.93	4209400.40	Worker	1.00	
5	600533.38	4209334.26	Worker	1.63	
6	600392.70	4209348.96	Worker	1.46	
7	600417.90	4209330.06	Worker	1.66	
8	600386.40	4209466.54	Worker	1.00	
9	600673.01	4209354.21	Worker	1.00	
10	600685.61	4209398.30	Worker	0.96	
11	600699.26	4209443.45	Worker	0.48	
12	600783.24	4209508.54	Worker	0.00	
13	600794.79	4209478.09	Worker	0.11	
14	600840.98	4209466.54	Worker	0.24	
15	600900.83	4209281.77	Worker	1.00	
16	600863.03	4209323.76	Worker	0.99	
17	600951.22	4209297.52	Worker	1.00	
18	600901.88	4209209.33	Worker	1.03	
19	600890.33	4209168.39	Worker	1.47	
20	600878.78	4209128.49	Worker	1.90	
21	600898.73	4209047.66	Worker	2.40	
22	600760.15	4209178.89	Worker	2.13	
23	600791.64	4209272.32	Worker	1.32	
24	600713.95	4209288.07	Worker	1.16	
25	600748.60	4209262.87	Worker	1.43	
26	600696.11	4209219.83	Worker	1.89	
27	600718.15	4209253.42	Worker	1.53	
28	600726.55	4209221.93	Worker	1.87	
29	600741.25	4209101.20	Worker	2.72	
30	600669.86	4209086.50	Worker	3.00	

31	600718.15	4209069.70	Worker	2.99
32	600725.50	4209036.11	Worker	2.99
33	600722.35	4208994.11	Worker	3.00
34	600668.81	4209040.31	Worker	3.00
35	600589.02	4209080.20	Worker	3.00
36	600539.68	4209085.45	Worker	3.00
37	600509.24	4209095.95	Worker	3.00
38	600534.43	4209170.49	Worker	2.40
39	600468.29	4209159.99	Worker	2.51
40	600429.45	4209121.14	Worker	2.92
41	600458.84	4209109.60	Worker	3.00
42	600425.25	4209085.45	Worker	3.00
43	600454.64	4209081.25	Worker	3.00
44	600497.69	4209067.60	Worker	3.00
45	600543.88	4209052.91	Worker	3.00
46	600577.47	4209043.46	Worker	3.00
47	600617.66	4208934.15	Worker	3.00
48	600475.64	4208936.37	Worker	3.93
49	600855.68	4209023.51	Worker	3.00
50	600366.46	4209131.64	Worker	2.80
51	600316.06	4209149.49	Worker	2.60
52	600341.26	4209095.95	Worker	3.00
53	600762.48	4209483.30	Worker	0.05
54	600609.63	4208911.42	Worker	3.22
55	600737.74	4209282.36	Worker	1.22
56	600700.98	4209240.20	Worker	1.67
57	600710.43	4209273.59	Worker	1.31
58	600741.45	4209245.94	Worker	1.62
59	600729.31	4209268.87	Worker	1.37
60	600776.19	4209261.11	Worker	1.46
61	600738.76	4209207.49	Worker	2.02
62	600920.10	4209184.98	Worker	1.30
63	600875.76	4209197.11	Worker	1.16
64	600882.76	4209226.52	Worker	1.00
65	600932.71	4209212.05	Worker	1.01
66	600911.23	4209145.30	Worker	1.73
67	600866.42	4209157.43	Worker	1.59
68	600904.23	4209120.09	Worker	2.00

69	600853.82	4209134.09	Worker	1.86
70	600500.00	4208925.00	Worker	3.99
71	600550.00	4208925.00	Worker	3.34
72	600600.00	4208925.00	Worker	3.07
73	600650.00	4208925.00	Worker	3.07
74	600700.00	4208925.00	Worker	3.08
75	600750.00	4208925.00	Worker	3.09
76	600450.00	4208975.00	Worker	3.51
77	600500.00	4208975.00	Worker	3.50
78	600550.00	4208975.00	Worker	3.15
79	600600.00	4208975.00	Worker	3.00
80	600650.00	4208975.00	Worker	3.00
81	600700.00	4208975.00	Worker	3.00
82	600750.00	4208975.00	Worker	3.00
83	600800.00	4208975.00	Worker	3.00
84	600850.00	4208975.00	Worker	3.00
85	600400.00	4209025.00	Worker	3.00
86	600450.00	4209025.00	Worker	3.00
87	600500.00	4209025.00	Worker	3.00
88	600550.00	4209025.00	Worker	3.00
89	600600.00	4209025.00	Worker	3.00
90	600650.00	4209025.00	Worker	3.00
91	600700.00	4209025.00	Worker	3.00
92	600750.00	4209025.00	Worker	3.00
93	600800.00	4209025.00	Worker	3.00
94	600850.00	4209025.00	Worker	3.00
95	600900.00	4209025.00	Worker	2.51
96	600350.00	4209075.00	Worker	3.00
97	600400.00	4209075.00	Worker	3.00
98	600450.00	4209075.00	Worker	3.00
99	600500.00	4209075.00	Worker	3.00
100	600550.00	4209075.00	Worker	3.00
101	600600.00	4209075.00	Worker	3.00
102	600650.00	4209075.00	Worker	3.00
103	600700.00	4209075.00	Worker	3.00
104	600750.00	4209075.00	Worker	2.76
105	600800.00	4209075.00	Worker	2.47
106	600850.00	4209075.00	Worker	2.48

107	600900.00	4209075.00	Worker	2.24
108	600350.00	4209125.00	Worker	2.87
109	600400.00	4209125.00	Worker	2.88
110	600450.00	4209125.00	Worker	2.89
111	600500.00	4209125.00	Worker	2.89
112	600550.00	4209125.00	Worker	2.90
113	600600.00	4209125.00	Worker	2.91
114	600650.00	4209125.00	Worker	2.91
115	600700.00	4209125.00	Worker	2.92
116	600750.00	4209125.00	Worker	2.49
117	600800.00	4209125.00	Worker	1.99
118	600850.00	4209125.00	Worker	1.95
119	600900.00	4209125.00	Worker	1.95
120	600950.00	4209125.00	Worker	1.95
121	600300.00	4209175.00	Worker	2.32
122	600350.00	4209175.00	Worker	2.33
123	600400.00	4209175.00	Worker	2.34
124	600450.00	4209175.00	Worker	2.34
125	600500.00	4209175.00	Worker	2.35
126	600550.00	4209175.00	Worker	2.36
127	600700.00	4209175.00	Worker	2.38
128	600750.00	4209175.00	Worker	2.20
129	600800.00	4209175.00	Worker	1.90
130	600850.00	4209175.00	Worker	1.49
131	600900.00	4209175.00	Worker	1.40
132	600950.00	4209175.00	Worker	1.41
133	600300.00	4209225.00	Worker	2.00
134	600350.00	4209225.00	Worker	2.00
135	600400.00	4209225.00	Worker	2.00
136	600450.00	4209225.00	Worker	2.00
137	600500.00	4209225.00	Worker	2.00
138	600700.00	4209225.00	Worker	1.84
139	600750.00	4209225.00	Worker	1.84
140	600800.00	4209225.00	Worker	1.71
141	600850.00	4209225.00	Worker	1.13
142	600900.00	4209225.00	Worker	1.00
143	600950.00	4209225.00	Worker	1.00
144	600300.00	4209275.00	Worker	2.00

145	600350.00	4209275.00	Worker	2.00
146	600400.00	4209275.00	Worker	2.00
147	600450.00	4209275.00	Worker	2.00
148	600500.00	4209275.00	Worker	2.00
149	600700.00	4209275.00	Worker	1.30
150	600750.00	4209275.00	Worker	1.30
151	600800.00	4209275.00	Worker	1.26
152	600850.00	4209275.00	Worker	1.04
153	600900.00	4209275.00	Worker	1.00
154	600950.00	4209275.00	Worker	1.00
155	600300.00	4209325.00	Worker	1.70
156	600350.00	4209325.00	Worker	1.71
157	600400.00	4209325.00	Worker	1.72
158	600450.00	4209325.00	Worker	1.72
159	600500.00	4209325.00	Worker	1.73
160	600700.00	4209325.00	Worker	1.00
161	600750.00	4209325.00	Worker	1.00
162	600800.00	4209325.00	Worker	1.00
163	600850.00	4209325.00	Worker	1.00
164	600900.00	4209325.00	Worker	0.88
165	600950.00	4209325.00	Worker	0.79
166	600350.00	4209375.00	Worker	1.17
167	600400.00	4209375.00	Worker	1.18
168	600450.00	4209375.00	Worker	1.18
169	600500.00	4209375.00	Worker	1.19
170	600550.00	4209375.00	Worker	1.20
171	600600.00	4209375.00	Worker	1.11
172	600650.00	4209375.00	Worker	1.00
173	600700.00	4209375.00	Worker	1.00
174	600750.00	4209375.00	Worker	1.00
175	600800.00	4209375.00	Worker	1.00
176	600850.00	4209375.00	Worker	1.00
177	600900.00	4209375.00	Worker	0.58
178	600950.00	4209375.00	Worker	0.25
179	600350.00	4209425.00	Worker	1.00
180	600400.00	4209425.00	Worker	1.00
181	600450.00	4209425.00	Worker	1.00
182	600500.00	4209425.00	Worker	1.00

183	600550.00	4209425.00	Worker	1.00
184	600600.00	4209425.00	Worker	0.84
185	600650.00	4209425.00	Worker	0.67
186	600700.00	4209425.00	Worker	0.67
187	600750.00	4209425.00	Worker	0.68
188	600800.00	4209425.00	Worker	0.69
189	600850.00	4209425.00	Worker	0.69
190	600900.00	4209425.00	Worker	0.30
191	600400.00	4209475.00	Worker	1.00
192	600450.00	4209475.00	Worker	1.00
193	600500.00	4209475.00	Worker	1.00
194	600550.00	4209475.00	Worker	1.00
195	600600.00	4209475.00	Worker	0.58
196	600650.00	4209475.00	Worker	0.13
197	600700.00	4209475.00	Worker	0.13
198	600750.00	4209475.00	Worker	0.14
199	600800.00	4209475.00	Worker	0.15
200	600850.00	4209475.00	Worker	0.15
201	600900.00	4209475.00	Worker	0.07
202	600450.00	4209525.00	Worker	0.56
203	600500.00	4209525.00	Worker	0.57
204	600550.00	4209525.00	Worker	0.57
205	600600.00	4209525.00	Worker	0.30
206	600650.00	4209525.00	Worker	0.00
207	600700.00	4209525.00	Worker	0.00
208	600750.00	4209525.00	Worker	0.00
209	600800.00	4209525.00	Worker	0.00
210	600850.00	4209525.00	Worker	0.00
211	600550.00	4209575.00	Worker	0.03
212	600600.00	4209575.00	Worker	0.02
213	600650.00	4209575.00	Worker	0.00
214	600700.00	4209575.00	Worker	0.00
215	600750.00	4209575.00	Worker	0.00
216	599033.89	4209012.62	Residenc	6.91
217	599022.61	4208973.68	Residenc	7.06
218	599007.24	4208924.49	Residenc	7.34
219	598981.62	4208845.59	Residenc	8.47
220	598957.03	4208769.75	Residenc	9.53

221	598940.63	4208717.49	Residenc	10.03
222	598925.26	4208672.40	Residenc	10.32
223	598909.89	4208626.29	Residenc	10.85
224	599005.19	4209037.21	Residenc	6.64
225	598956.00	4209042.34	Residenc	6.61
226	598874.02	4209063.86	Residenc	7.00
227	598790.00	4209088.45	Residenc	7.02
228	598721.34	4209112.02	Residenc	6.80
229	598618.86	4209133.54	Residenc	6.55
230	598532.78	4209151.99	Residenc	6.34
231	598455.93	4209177.60	Residenc	6.05
232	598372.67	4210241.08	Residenc	0.00
233	598349.31	4210169.33	Residenc	0.06
234	598329.28	4210099.24	Residenc	0.50
235	598317.60	4210050.85	Residenc	0.85
236	598355.98	4209989.11	Residenc	1.03
237	598337.63	4209924.03	Residenc	1.37
238	598319.27	4209855.61	Residenc	1.89
239	598297.58	4209785.52	Residenc	2.44
240	598275.88	4209717.10	Residenc	3.31
241	598262.53	4209662.03	Residenc	3.80
242	598244.18	4209601.96	Residenc	4.86
243	598304.25	4210012.47	Residenc	1.01
244	600636.34	4207000.93	Residenc	25.81
245	600680.31	4207029.30	Residenc	25.15
246	600737.05	4207061.93	Residenc	24.46
247	600789.53	4207110.16	Residenc	23.44
248	600829.25	4207155.55	Residenc	22.41
249	600880.32	4207179.66	Residenc	21.96
250	600949.82	4207191.01	Residenc	20.98
251	601019.33	4207193.85	Residenc	20.02
252	601090.26	4207165.48	Residenc	20.03
253	601161.18	4207144.20	Residenc	19.55
254	601222.18	4207125.76	Residenc	19.25
255	601286.01	4207107.32	Residenc	18.55
256	601359.77	4207081.79	Residenc	18.05
257	601372.54	4207020.79	Residenc	18.29
258	602609.61	4207445.41	Residenc	10.47

259	602652.16	4207445.41	Residenc	10.16	
260	602676.28	4207487.97	Residenc	9.32	
261	602708.91	4207547.55	Residenc	8.25	
262	602737.28	4207607.13	Residenc	7.24	
263	602765.65	4207662.45	Residenc	6.24	
264	602805.37	4207741.89	Residenc	6.00	
265	602884.81	4207751.82	Residenc	6.00	
266	602940.13	4207741.89	Residenc	6.00	
267	602998.29	4207713.52	Residenc	6.00	
268	603291.94	4207747.56	Residenc	6.00	
269	603290.52	4207828.42	Residenc	6.00	
270	603291.94	4207907.86	Residenc	5.43	
271	603289.10	4207971.70	Residenc	5.02	
272	599124.62	4208092.38	School	13.80	
273	600916.73	4206751.61	School	27.32	
274	603361.06	4207525.29	School	6.00	
275	597833.99	4209670.57	School	4.64	
276	599137.30	4208318.14	School	11.84	

Plant Boundary Receptors

Receptor Groups

Record Number	Group ID	Group Description
1	Worker	
2	FENCEPRI	Cartesian plant boundary Primary Receptors
3	FENCEINT	Cartesian plant boundary Intermediate Receptors
4	Residenc	
5	School	

Meteorology Pathway

Met Input Data

Surface Met Data

Filename: ..\Met Data\Concord-Buchanan Field (KCCR)\AERMOD.SFC
Format Type: Default AERMET format

Profile Met Data

Filename: ..\Met Data\Concord-Buchanan Field (KCCR)\AERMOD.PFL
Format Type: Default AERMET format

Wind Speed

☐ Wind Speeds are Vector Mean (Not Scalar Means)

Wind Direction

Rotation Adjustment [deg]:

Potential Temperature Profile

Base Elevation above MSL (for Primary Met Tower): 23.60 [m]

Meteorological Station Data

Stations	Station No.	Year	X Coordinate [m]	Y Coordinate [m]	Station Name
Surface Upper Air		2013 2013			OAKLAND/WSO AP

Data Period

Data Period to Process

Start Date: 1/1/2013 Start Hour: 1 End Date: 12/31/2017 End Hour: 24

Wind Speed Categories

Stability Category	Wind Speed [m/s]	Stability Category	Wind Speed [m/s]
A	1.54	D	8.23
B	3.09	E	10.8
C	5.14	F	No Upper Bound

Output Pathway

Tabular Printed Outputs

Short Term Averaging Period	RECTABLE Highest Values Table										MAXTABLE Maximum Values Table	DAYTABLE Daily Values Table
	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th		
1	■	☐	☐	☐	☐	☐	☐	☐	☐	☐		No

Contour Plot Files (PLOTFILE)

Path for PLOTFILES: \AERMOD.AD

Averaging Period	Source Group ID	High Value	File Name
1	COOL	1st	01H1G001.PLT
1	DPM	1st	01H1G002.PLT
1	PM2.5	1st	01H1G003.PLT
1	SCRUBBER	1st	01H1G004.PLT
1	SLINE1	1st	01H1G005.PLT
Period	COOL	N/A	PE00G001.PLT
Period	DPM	N/A	PE00G002.PLT
Period	PM2.5	N/A	PE00G003.PLT
Period	SCRUBBER	N/A	PE00G004.PLT
Period	SLINE1	N/A	PE00G005.PLT

Results Summary

C:\Users\MikeRatte\Documents\Projects\Pittsburg Iron Salts Plant\Air

DPM - Concentration - Source Group: COOL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	217.34121	ug/m^3	600450.00	4209125.00	2.89	1.80	2.89	8/31/2017, 19
PERIOD		3.32070	ug/m^3	600650.00	4209375.00	1.00	1.80	1.00	

DPM - Concentration - Source Group: DPM

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	6146.61269	ug/m^3	600650.00	4209375.00	1.00	1.80	1.00	1/17/2013, 9
PERIOD		24.31648	ug/m^3	600696.11	4209219.83	1.89	1.80	1.89	

DPM - Concentration - Source Group: PM2.5

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	6688.15534	ug/m^3	600650.00	4209375.00	1.00	1.80	1.00	1/17/2013, 9
PERIOD		24.52132	ug/m^3	600696.11	4209219.83	1.89	1.80	1.89	

DPM - Concentration - Source Group: SCRUBBER

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	566.94417	ug/m^3	600500.00	4209225.00	2.00	1.80	2.00	3/8/2015, 4
PERIOD		20.97376	ug/m^3	600673.01	4209354.21	1.00	1.80	1.00	

Results Summary

C:\Users\MikeRatte\Documents\Projects\Pittsburg Iron Salts Plant\Air

DPM - Concentration - Source Group: SLINE1

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	751.71709	ug/m^3	600600.00	4209025.00	3.00	1.80	3.00	11/5/2013, 17
PERIOD		11.46391	ug/m^3	600500.00	4208975.00	3.50	1.80	3.50	

Tower Specifications: Model T-2250

Cooling Tower Systems, Inc.

Design and Operating Conditions		Water Distribution System Construction Materials	
Tower Type:	Counter Flow Induced Draft	Stand Pipe:	PVC
Water Flow Rate (GPM):	737 GPM	Sprinkler Head:	AC
Entering Water Temperature	95°F	Sprinkler Pipes:	PVC
Leaving Water Temperature	85°F	**Mechanical Equipment**	
Wet Bulb Temperature:	75°F	Fan Unit:	One Unit per Tower
Total Fan BHP:	7.5 HP	Type:	Axial Flow
Total Pump Head:	12’	Manufacturer:	CTS
Drift Loss of Water Flow:	0.1%	Diameter:	93”
Evaporation Loss of Water Flow:	0.93%	Blade Material:	AC
Design Wind Load:	41 lbs/sq. ft.	Hub Material:	AC
Structural Details		Nominal Air Volume:	61,270 CFM
Overall Diameter:	148 3/8”	**Fan Motor**	
Overall Height:	125 5/8”	Number of motors:	One Unit per Tower
Dry Weight:	2,270 lbs.	Type:	Induction
Operating Weight:	8,723 lbs.	Manufacturer:	CTS
Basic Tower Construction Materials		Insulation:	F Class
Tower Support Frame Assembly	HDGS	Rated HP:	7.5 HP
Casing:	FRP	Voltage and phase:	220/440V/3
Casing Supporters	HDGS	**Piping Connections**	
Cold Water Basin	FRP	Primary Water Inlet Diameter	8”
Filling:	PVC	Primary Water Outlet Diameter:	8”
Filling Supports:	HDGS	Auto fill inlet diameter:	1.25”
Fan Guard	HDGS	Quick fill inlet diameter:	1.25”
Mechanical Equipment Supports:	HDGS	Overflow outlet diameter:	2”
Inlet Louvers:	PVC	Drain diameter:	2”
Bolts, Nuts & Washers:	STS	Water Flow (GPM):	737 GPM

Materials Key			
FRP	Fiberglass Reinforced Polyester	STS	Stainless Steel
HDGS	Hot Dipped Galvanized Steel	AC	Aluminum Alloy Cast

Cooling Tower Systems, Inc.
196 Lower Cherry Street Macon, GA 31201
TF: 800.752.1905 F: 478.755.8304 www.coolingtowersystems.com info@coolingtowersystems.com

Cooling Tower Operational Data				
Source Description	**Average Recirculation Flow Rate (gal/min)**	**Peak Hourly Recirculation Flow Rate[1] (gal/min)**	**Annual Operation (hrs/yr)**	**Annual Throughput[2] (gal/yr)**
Cooling Tower	737	1105.5	6,240	275,932,800

Notes: (1) Peak Hourly is conservatively estimated at 1.5 average recirculation rate.

(2) Annual Throughput = Avg Hourly Flow Rate (gal/min) * Annual Operation

Cooling Tower Emission Factors			
Process	**VOC**	**PM**	**Chloroform**
Chemical Plant Cooling Towers	0.7	19	0.018

Sources: VOC - AP-42, Section 5.1, Table 5.1-2 PM - AP-42, Section 13.4, Table 13.4-1

PM - AP-42, Section 13.4, Table 13.4-1

Chloroform - Summary of Literature Search on HAP Emissions From IPCTs (2004, RTI)

Cooling Tower Emissions			
Process	**VOC**	**PM10**	**Chloroform**
Peak Hourly Emissions (lb/hr)	0.04643	1.26027	0.00119
Annual Emissions (lb/yr)	193.15	5242.72	4.97
Average Daily Emissions (lb/yr)	0.03095	20.16432	0.01910

HCl Gas Scrubbing using Water

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for RK Fabrication (Stage 1 of 2, acid fumes from ferric chloride tank)

Inlet Gas Flow	15,000	acfm	HCl in Blowdown	1.0%	
Inlet HCl Concentration	20	ppm_v	Blowdown pH	0.5	
Atmospheric Pressure	28.82	in. Hg	HTU_{OG}	0.86	ft
Inlet Static Pressure	-2	in.WC	NTU	9.30	
Inlet Gas Temperature	140	°F	HCl Gas Removal	97.0%	
Make-up Water Temperature	70	°F	Outlet HCl Gas Concn.	0.6	ppm_v
Make-up Water HCl Content	0%		Outlet Air Flow	15,077	acfm
Liquid Flow Rate	100	gpm	Packing Liquid Holdup	1.8%	
Blowdown Rate	0.26	gpm	Packing Volume	238	ft^3
Tower Diameter	5.5	ft	Liquid Residence Time	20	sec
Packing Height	10.0	ft	Pressure Gradient	0.16	in.WC/ft
Design Safety Factor	1.25		Packing Pressure Drop	1.6	in.WC
Mist Eliminator Type	No.2 NUPAC (1.5 ft)		Mist Eliminator ΔP	0.5	in.WC
Packing Type	Q-PAC				

Air Flow Rate	12,693	scfm	Cross-Section Area	23.8	ft^2
=	32.81	lbmol/min	Gas Molecular Weight	29	lb/lbmol
HCl Removed	0.001	lbmol/min	Gas Density	0.064	lb/ft^3
=	0.02	lb/min	Liquid Density	8.39	lb/gal
=	1.4	lb/h	Superficial Gas Velocity	631	ft/min
=	0.3	mol/min	Gas Loading	2,408	$lb/h\text{-}ft^2$
blowdown	16	gal/h	Liquid Loading	2,119	$lb/h\text{-}ft^2$
	1.0	L/min	=	4.2	gpm/ft^2
x_1	0.0052	mol/mol	T_{in}	333	K
x_2	0.0052	mol/mol	T_{out}	333	K
y_1*	0.61	ppm_v	P_{in}	0.958	atm
y_2*	0.61	ppm_v	P_{out}	0.953	atm
Heat of Solution	1.22E+03	Btu/h	HTU_G	0.86	ft
Sensible Heat	8.75E+03	Btu/h	HTU_L	0.32	ft
Evaporation	-0.007	$lbmol_{H2O}$/min	$HTU_G + HTU_L/A$	0.86	ft
Inlet Air Moisture Content	20.5%	v/v	Air-Water Partition Coeff.	1.1E-04	atm-mol/mol
Dry Gas Flow	26.08	$lbmol_{DG}$/min	Absorption Factor	1.2E+04	
Outlet Moisture Content	0.258	mol_{H2O}/mol_{DG}	ρ_L	1.01	g/cm^3
=	20.51%	v/v	μ_L	1.08	lb/h-ft
Outlet Gas Flow	12,690	scfm	D_L	1.25E-04	ft^2/h
Outlet Liquid Temperature	140	°F			

Scrubbing Hydrogen Chloride Gas using Caustic Soda

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for RK Fabrication (Stage 2 of 2, tail gas from HCl absorber)

Inlet Gas Flow	15,112	acfm	Steady-State Temperature	140	°F
Inlet Wet-Bulb Temperature	140	°F	Outlet Gas Flow	15,110	acfm
Inlet HCl Concentration	0.6	ppm_v	TDS in Blowdown	0.1%	
Inlet CO_2 Concentration	415	ppm_v	HTU_{HCl}	0.86	ft
Liquid Recirculation Rate	100	gpm	NTU_{HCl}	9.28	
Blowdown Rate	0.1	gpm	Outlet HCl Concentration	0.00006	ppm_v
Make-up Water Temperature	70	°F	HCl Removal Efficiency	99.99%	
Atmospheric Pressure	28.82	in.Hg	Pressure Gradient	0.16	in.WC/ft
Inlet Static Pressure	-5	in.WC	Packing Pressure Drop	1.6	in.WC
pH in Sump	7.5		Liquid Holdup	1.8%	
Make-up NaOH Concentration	25%		Packing Volume	238	ft^3
Tower Diameter	5.5	ft	Liquid Residence Time	20	sec
Packing Height	10.0	ft	NaOH Usage	0.048	lb/h
Safety Factor	1.25		=	0.018	gal/h
Packing Type	Q-PAC		=	0.0003	gpm
Demister Type	No.2 NUPAC (1.5 ft)		Demister Pressure Drop	0.7	in.WC

Inlet Gas Flow	12,690	scfm	Cross-Section Area	23.8	ft^2
=	32.8	lbmol/min	Gas Molecular Weight	29	lb/lbmol
HCl Removed	0.00002	lbmol/min	Inlet Gas Density	0.063	lb/ft^3
=	0.0007	lb/min	Liquid Density	8.35	lb/gal
=	0.009	mol/min	Inlet Gas Velocity	636	ft/min
CO_2 Removed	7.27E-08	lbmol/min	Outlet Gas Velocity	636	ft/min
blowdown	6.0	gal/h	Gas Loading	2,402	$lb/h\text{-}ft^2$
=	0.379	L/min	Liquid Loading	2,109	$lb/h\text{-}ft^2$
$[Cl^-]$	0.024	mol/L	=	4.2	gpm/ft^2
$[CO_2]+[HCO_3^-]+[CO_3^=]$	8.71E-05	mol/L	$[H^+]$	3.16E-08	mol/L
$[CO_2]$	6.04E-06	mol/L	T	333	K
$[HCO_3^-]$	8.10E-05	mol/L	P_T	0.95	atm
$[CO_3^=]$	1.11E-07	mol/L	K_w	1.03E-13	mol^2/L^2
$[Na^+]$	2.39E-02	mol/L	CO_2 K_1	4.24E-07	mol/L
NaCl	1.4	g/L	CO_2 K_2	4.33E-11	mol/L
$NaHCO_3$	0.0	g/L		HCl	CO_2
Na_2CO_3	0.0	g/L	H (atm/mole fraction)	n/a	3,183
free NaOH	0.000	g/L	y_1 (ppm_v)	0.6	415.0
Total Dissolved Solids	1.4	g/L	y_2 (ppm_v)	0.0	415.0
Blowdown Density	1.00	g/mL	Removal Efficiency	99.99%	0.001%
$NaHCO_3$ Saturation Index	-5.6		y_1* (ppm_v)	0	364.1
Na_2CO_3 Saturation Index	-11.0		y_2* (ppm_v)	0	363.7
NaCl Saturation Index	-4.7		$(y\text{-}y^*)_{lm}$ (ppm_v)	0.07	51
Heat of Reaction	1.13E+00	Btu/min	NTU	9.28	0.68
Sensible Heat	5.84E+01	Btu/min	HTU (ft)	0.86	11.8
Evaporation	-0.003	lbmol/min	NCG Flow	26.0	lbmol/min
Satd. $y_{1,H2O}$	20.7%		Make-up NaOH Density	1.27	g/mL
=	0.261	mol_{H2O}/mol_{NCG}	Caustic reacting with HCl	99.6%	of total
$y_{2,H2O}$	20.7%		Alkali Exhaustion per Pass	22%	

Stack Gas Exhaust Flow Rate	scfm	12,690
Stack Gas Exhaust Flow Rate	m3/hour	21,560

	MW	ppb	ug/m3	g/hour	lb/hour	lb/year	MT/year
HCL (Uncontrolled)	36.46	20,000	29,824	643	1.42	12,418	
HCL (Stage 1)	36.46	600	895	19.3	0.04	373	
HCL (Stage 2)	36.46	0.06	0.09	1.93E-03	4.25E-06	0.037	
CO2	44.01	415,000	747,004	1.61E+04	3.55E+01	311,037	141

APPENDIX C

MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM – PENCCO IRON SALTS MANUFACUTRING FACILITY (AP-23-0167)

Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
AIR QUALITY			
Mitigation Measure AQ-1: The applicant shall implement the following during construction of the Project: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. • All trucks and equipment, including their tires, shall be washed off prior to leaving the site. • Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted wood chips, mulch, or gravel. • A publicly visible sign shall be posted with the telephone number and the person to contact the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.	City of Pittsburg Community Development Department	During construction activities	
Mitigation Measure AQ-2: The applicant shall implement the following during construction of the Project: • All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall utilize diesel engines that are USEPA certified "Tier 4 final" emission standards for particulate matter. Prior to the issuance of any demolition/construction permits, the construction contractor shall submit specifications of the equipment to be used during construction and the city of Pittsburg shall confirm this requirement is met. • Equipment such as air compressors, concrete/industrial saws, forklifts, light stands, manlifts, pumps, and welders shall be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators.	City of Pittsburg Community Development Department	During construction activities	

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Attachment 1 (Exhibit B)

Mitigation Monitoring and Reporting Program

Pencco Iron Salts Manufacturing Facility (AP-23-0167)

Mitigation Measure	Monitoring Agency	Implementation Schedule
Mitigation Measure AQ-1: The applicant shall implement the following during construction of the Project: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. • All trucks and equipment, including their tires, shall be washed off prior to leaving the site.	City of Pittsburg Community Development Department	During Construction

• Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted wood chips, mulch, or gravel. • A publicly visible sign shall be posted with the telephone number and the person to contact the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.		
Mitigation Measure AQ-2: The applicant shall implement the following during construction of the Project: • All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall utilize diesel engines that are USEPA certified "Tier 4 final" emission standards for particulate matter. Prior to the issuance of any demolition/construction permits, the construction contractor shall submit specifications of the equipment to be used during construction and the city of Pittsburg shall confirm this requirement is met. • Equipment such as air compressors, concrete/industrial saws, forklifts, light stands, manlifts, pumps, and welders shall be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators.	City of Pittsburg Community Development Department	During Construction

ATTACHMENT 2

Pencco Iron Salts Manufacturing Facility Project (AP-23-0167)
Initial Study/ Mitigated Negative Declaration (SCH No. 2025010603)

Response to Comments
April 8, 2025

This Response to Comments document contains comments received during the public review period of the Pencco Iron Salts Manufacturing Facility Project Draft Initial Study/Mitigated Negative Declaration (IS/MND).

BACKGROUND

The City of Pittsburg Planning Division, as lead agency, released the Draft IS/MND for public review beginning on January 22, 2025, and ending on February 21, 2025, pursuant to CEQA Guidelines Section 15105. The Draft IS/MND and supporting documents were made available on the City's website and by appointment during normal business hours at the City of Pittsburg Planning Division, located at 65 Civic Avenue, Pittsburg, CA 94565. According to CEQA Guidelines Sections 15073 and 15074, the lead agency must consider the comments received during consultation and review periods together with the negative declaration. However, unlike with an Environmental Impact Report, comments received on a negative declaration are not required to be attached to the negative declaration, nor must the lead agency make specific written responses to public agencies. Nonetheless, the City has chosen to provide responses to letters that had specific comments regarding the analysis within the Draft IS/MND.

LIST OF COMMENTERS

The City received four letters during the public comment period on the Draft IS/MND for the proposed Project. PG&E issued a letter on February 19, 2025 with no comments on the environmental analysis other than confirming the proposed Project would not directly interfere with existing PG&E facilities or easements. CalTrans issued a letter dated February 20, 2025 with no comments on the environmental analysis other than confirming that the Project would have less than significant Vehicle Miles Traveled (VMT) impacts. Therefore, the following letters are considered in this Response to Comments Document:

Letter A ..... Adams Broadwell Joseph & Cardozo, February 21, 2025
Letter B …….. Confederated Villages of Lisjan Nation, January 30, 2025

RESPONSE TO COMMENTS

The Response to Comments below include responses to Comment Letters A and B. Letters A and B is bracketed with assigned comment numbers. The bracketed comment letters are followed by numbered responses corresponding to each bracketed comment.

ADAMS BROADWELL JOSEPH & CARDOZO
A PROFESSIONAL CORPORATION

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February 21, 2025

VIA E-Mail and U.S. Mail

Maurice Brenyah-Addow
Community & Economic Development Department
Planning Division
City of Pittsburg
65 Civic Avenue
Pittsburg, California 94565
mbrenyah-addow@pittsburgca.gov

Re: **Comments on Draft Initial Study/Mitigated Negative Declaration for the Pencco Iron Salts Manufacturing Facility Project (Case No. AP-23-0167, SCH No. 2025010603)**

Dear Mr. Brenyah-Addow:

We write on behalf of Safe Fuel and Energy Resources California ("SAFER CA") to comment on the Draft Initial Study/Mitigated Negative Declaration[1] ("MND") prepared by the City of Pittsburg ("City") pursuant to the California environmental Quality Act[2] ("CEQA") for the Pencco Iron Salts Manufacturing Facility Project (Case No. AP-23-0167, SCH No. 202501603) ("Project") proposed by Pencco, Inc ("Applicant"). A-1

The MND fails to provide a comprehensive and meaningful evaluation of all the Project's possible adverse effects and lacks substantial evidence to support its conclusion that there will be no significant environmental impacts with the implementation of mitigation. As detailed below, substantial evidence supports a fair argument that the proposed Project may cause potentially significant, unmitigated air quality, public health, geology, hazards, and land use impacts, which requires the City to prepare an environmental impact report ("EIR").

[1] City of Pittsburg, Pennco Iron Salst Manufacturing Facility: Draft Initial Study/Mitigated Negative Declaration (Jan. 2025) (hereinafter "MND"), *available at* https://www.pittsburgca.gov/home/showpublisheddocument/17101/638731534770730000.
[2] Pub. Res. Code §§ 21000 *et seq.*

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I. INTRODUCTION

The proposed Project would produce iron salts for wastewater and drinking water treatment.[3] It would be developed on 1.38-acres within the existing Corteva (formerly Dow Chemical) industrial complex at 901 Loveridge Road in Pittsburg, California.[4] The Corteva complex includes chemical manufacturing plants, water processing facilities, loading and unloading areas, materials and waste storage sites, vehicle and equipment maintenance and fueling areas, as well as closed and operating landfills.[5]

The Project would repurpose existing buildings onsite for a control lab, office space, and a maintenance facility.[6] Additional site components would include a containment area for the manufacturing process, an open truck parking lot with loading docks and scales, and automobile parking with associated landscaping.[7] Key facility components include: 10 reactor tanks of various sizes, 18 storage tanks of various sizes, two-stage air scrubber system, a cooling tower, a filter press, ore and scrap containment areas, an overhead crane, air compressors, and sump pump drains.[8]

A-2

The manufacturing process involves dissolving iron ore and high-purity scrap iron with chlorine and hydrochloric acid (HCL).[9] These reactions take place in specially designed reactors built to withstand corrosive conditions.[10] The resulting iron salts would be transported to wastewater and drinking water treatment plants across California.[11] Raw materials would be delivered to the facility by truck, while HCL and chlorine would be supplied via pipeline from existing chlorine plants within the Corteva complex.[12]

Construction of the Project would occur intermittently over approximately 14 months, typically taking place Monday through Friday from 8:00 a.m. to 5:00 p.m.[13]

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[3] MND at p. 1.
[4] *Id.* at p. 2.
[5] *Ibid.*
[6] *Ibid.*
[7] *Ibid.*
[8] *Ibid.*
[9] *Id.* at p. 5.
[10] *Ibid.*
[11] *Ibid.*
[12] *Ibid.*
[13] *Id.* at p. 12.

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The construction process would involve demolition, site preparation, grading, building construction, equipment installation, paving, and architectural coating.[14] Key construction activities include the removal of 16,000 cubic yards of soil, removal of 27,000 square feet of existing pavement, and installation of 26,000 square feet of new pavement.[15]

A-2 cont.

Based on our evaluation of the MND and supporting documents, we conclude that the MND fails to comply with CEQA. Specifically, the MND fails to comprehensively assess, disclose, and mitigate potentially significant adverse impacts related to air quality, public health, hazards, geology, and land use arising from both construction and operation of the Project. There is substantial evidence supporting a fair argument that the Project may result in potentially significant, unmitigated impacts. To address these defects and potentially significant impacts, the City must prepare an EIR that fully discloses, analyses, and mitigates the Project's potentially significant impacts, while also exploring viable alternatives.

A-3

These comments were prepared with the assistance and expertise of air quality and toxicologist, James J. J. Clark, Ph.D., whose detailed comments and qualifications are included as Attachment A.[16] The City must respond to Dr. Clarks' comments separately and fully.

II. STATEMENT OF INTEREST

SAFER CA advocates for safe processes at California's industrial facilities to protect the health, safety, standard of life and economic interests of its members. For this reason, SAFER CA has a strong interest in enforcing environmental laws, such as CEQA, which require the disclosure of potential environmental impacts of, and ensure safe operations and processes for, California's industrial projects. Failure to adequately address the environmental impacts of such projects poses a substantial threat to the environment, worker health, surrounding communities and the local economy.

A-4

[14] *Ibid.*
[15] *Ibid.*
[16] **Attachment A**, Letter to Andrew J. Graf, Adams Broadwell Joseph & Cardozo from James J.J. Clark, Ph.D., Clark & Associates Environmental Consulting, Inc. re: Comments on Draft Initial Study/Mitigated Negative Declaration for Pencco Iron Salts Manufacturing Facility, City of Pittsburg, California SCH No. 2025010603 (Feb. 21, 2025) (hereinafter "Clark Comments").

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The members represented by the participants in SAFER CA live, work, recreate, and raise their families in the City, Contra Costa County, and the surrounding area. Accordingly, these people would be directly affected by the Project's adverse environmental impacts. The members of SAFER CA's participating labor organizations could also work on the Project itself. They will, therefore, be first in line to be exposed to any hazardous materials, air contaminants, and other health and safety hazards, that exist onsite.

A-4 Cont.

SAFER CA seeks to ensure a sustainable construction industry over the long-term by supporting projects that offer genuine economic and employment benefits while minimizing adverse environmental and other impacts on local communities. SAFER CA and its members are concerned about projects like this one that risk serious environmental harm without providing countervailing economic benefits. CEQA provides a balancing process whereby economic benefits are weighed against significant impacts to the environment.[17] It is in this spirit we offer these comments.

III. THE CITY MUST PREPARE AN ENVIRONMENTAL IMPACT REPORT

CEQA mandates that lead agencies prepare an EIR for projects that may have significant environmental effects.[18] The purpose of an EIR is to ensure that the public and decision-makers are fully informed about potential environmental consequences before decisions are made, thus promoting informed decision-making and protecting the environment.[19]

A-5

The "fair argument" standard underscores a preference for EIR preparation. Under this standard, an EIR must be prepared if there is substantial evidence in the record indicating a fair argument that the project could significantly impact the environment.[20] This standard sets a "low threshold" for triggering environmental review through an EIR, rather than through a mitigated negative declaration,

[17] Pub. Res. Code § 21081(a)(3); *Citizens for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151, 171.
[18] Pub. Res. Code § 21000; 14 Cal. Code Regs. ("CEQA Guidelines") § 15002.
[19] *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564.
[20] Pub. Resources Code §§ 21080(d), 21082.2(d); CEQA Guidelines §§ 15002(k)(3), 15064(f)(1), (h)(1); *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 1501-51; *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.Appl.4th 1597, 1601-02.

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A-5 Cont.

which is only appropriate if all potentially significant effects of the project are avoided or reduced to insignificance.[21]

A-6

"Substantial evidence" required to support a fair argument means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached."[22] In cases where it's uncertain whether substantial evidence exists regarding a project's potential environmental effects, the lead agency must consider expert opinion and facts.[23] If there is disagreement among experts about the significance of an effect on the environment, the lead agency shall treat the effect as significant and prepare an EIR.[24]

A. Substantial Evidence Supports a Fair Argument that the Project May Result in Significant Hazard Impacts

1. The MND Fails to Analyze Health Risks from Soil and Groundwater Contamination

A-7

The proposed Project site is included on the Cortese list due groundwater contamination.[25] The Corteva industrial complex has historically been used to produce chlorine, sodium hydroxide, hydrogen, and chlorinated solvents such as carbon tetrachloride and tetrachlorethylene ("PCE").[26] As a result, the site has an extensive history of hazardous material use and contamination.[27]

However, the MND fails to adequately assess or mitigate risks associated with this contamination. While the MND acknowledges the potential for residual contamination, it only generally states that "soils underlying the pavement slated for removal could be impacted with residual contaminants including hydrocarbons, metals, or pesticides."[28] This statement is insufficient because the MND fails to fully analyze the extent of the contamination at the Project site and does not include mitigation measures to address potential human health and environmental risks.

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[21] Pub. Res. Code § 21080(c)(2); CEQA Guidelines § 15070(b).
[22] CEQA Guidelines § 15384(a).
[23] *Id.* § 15064(g).
[24] *Ibid.*
[25] MND at p. 58.
[26] Clark Comments at p. 7.
[27] MND at p. 54; Clark Comments at p. 7.
[28] MND at p. 54.

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A lead agency cannot evade its responsibility by failing to gather relevant data.[29] Under CEQA, an agency must conduct a thorough investigation of environmental hazards and propose specific, enforceable mitigation measures.[30]

Moreover, the GeoTracker listing for the site identifies benzene, mercury, other chlorinated hydrocarbons, PCE, toluene, trichloroethylene, and vinyl chloride as potential contaminants of concern.[31] Dr. Clark's review of groundwater data from nearby monitoring wells confirms the presence of multiple hazardous contaminants, including PCE, in close proximity to the Project site.[32] He found that many of these chemicals were detected at concentrations exceeding screening thresholds set by the Department of Toxic Substances Control ("DTSC"), underscoring the potential risks.[33]

A-7 Cont.

For example, PCE at a well approximately 300 feet from the Project site showed a concentration of 4,200 µg/L, well in excess of DTSC's screening threshold of 1,600 µg/L.[34] Dr. Clark's findings provide substantial evidence supporting a fair argument that onsite workers could be exposed to harmful indoor air contamination during operation due to vapor intrusion. Despite these documented high concentrations, the MND fails to analyze this risk for indoor workspaces at the Project site.[35]

Dr. Clark's findings also demonstrate that disturbing potentially contaminated soil during construction may result in significant health risks, particularly to construction workers, who may be exposed to hazardous chemicals through direct contact, inhalation of contaminated dust, or volatilization from groundwater. The failure to assess these potentially significant risks and implement protective measures renders the MND legally deficient under CEQA.

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[29] *Sundstrom v. County of Mendicino* (1988) 202 Cal.App.3d 296, 311; *Save Agoura Cornell Knoll v. City of Agoura Hills* (2020) 46 Cal.App.5th 665, 674; *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, 406 n. 14.

[30]

[31] State Water Resources Control Board, GeoTracker, Dow Chemical Co Pittsburg Facility (SL20210828), https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL20210828 (last visited Feb. 21, 2025).

[32] Clark Comments at pp. 7-9.

[33] *Ibid.*

[34] *Id.* at p. 7-8.

[35] *Ibid.*

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A-7 Cont.

Therefore, substantial evidence supports a fair argument the proposed Project would result in potentially significant hazard impacts.

2. The MND Fails to Analyze Compliance with the California Accidental Release Program

The MND states that the Project would be regulated by California Accidental Release Program ("CalARP") as part of the existing Corteva industrial complex.[36] CalARP requires facilities handling regulating substances above threshold quantities to prepare a risk management plan ("RMP"),[37] which includes an offsite consequences analysis based on a worst case-release scenario for each regulated chemical.[38] Facilities are then classified into one of four program levels, each requiring specific protocols for chemical hazard analysis and management plans for routine and non-routine situations.

A-8

However, the MND fails to explain why a separate RMP is not required, despite the Project's anticipated use of approximately 12,000 pounds per hour of hydrochloric acid, 6,000 pounds per hour of sulfuric acid, and 6,000 pounds per hour of chlorine – all of which is regulated under CalARP.[39] Critically, the MND does not disclose whether the total quantity of these substances contained within the Project's process exceeds CalARP thresholds. This omission is significant, as exceeding these limits could trigger additional regulatory and mitigation requirements. The lack of analysis prevents a clear understanding of whether the Project increases hazardous materials risks.[40]

Moreover, given the high quantities of hydrochloric acid, sulfuric acid, and chlorine on the Project site, Dr. Clark recommends that the City perform a quantitative risk assessment using standard modeling tools for assessing toxic gas clouds, such as the U.S. Environmental Protection Agency's ("EPA") Areal Locations of Hazardous Atmospheres ("ALOHA") model.[41]

By failing to determine whether the Project's chemical use exceeds regulatory thresholds requiring preparation of an independent RMP, the MND improperly

[36] MND at p. 56.
[37] 19 Cal. Code Regs. §§ 5050.1, 5050.4.
[38] *Id.* §§ 5080.3.
[39] MND at p. 10.
[40] Clark Comments at p. 13.
[41] *Ibid.*

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A-8 Cont.

defers analysis of significant hazardous materials impacts in violation of CEQA. CEQA requires a full and transparent assessment of potential environmental and public safety risks at the earliest stage, yet the MND lacks any meaningful evaluation of the Project's potential to increase chemical hazards.

3. The MND Mischaracterizes the Soil Management Plan as a Project Design Feature, Resulting in Improper Deferral of Mitigation

The MND improperly classifies the soil management plan ("SMP") as a project design feature ("PDF") rather than a mitigation measure, which undermines the analysis of the project's environmental impacts and constitutes an improper deferral of mitigation in violation of the CEQA.

The MND acknowledges the potential for discovering unanticipated soil contamination during grading, excavation, and soil removal given the Project's location within the Corteva chemical manufacturing complex.[42] In response, the MND states that the Project would implement an SMP to establish protocols for notifications, health and safety measures, sampling and analysis, monitoring, soil removal, stockpiling, water quality protection, and transportation.[43] However, by categorizing the SMP as a PDF rather than a mitigation measure, the MND avoids conducting a full analysis of potential soil contamination impacts and fails to ensure the enforceability of necessary remedial actions.

A-9

CEQA mandates that an MND disclose and analyze all potentially significant impacts of a project and include enforceable mitigation measures to reduce those impacts to a less-than-significant level. PDFs, in contrast, are features of the project's design that inherently minimize environmental impacts without the need for additional mitigation. A critical distinction between PDFs and mitigation measures is that mitigation must include specific performance standards and enforcement mechanisms to ensure its effectiveness.[44] By treating the SMP as a PDF, the MND improperly characterizes it as an intrinsic component of the project rather than a required response to a potentially significant environmental impact.

Furthermore, the MND improperly defers mitigation by failing to identify specific remediation measures or establish clear performance standards. CEQA does not allow deferral of mitigation unless the MND: (1) commits to specific

[42] MND at pp. 12, 54-55.
[43] *Ibid.*
[44] *Lotus v. Department of Transp.* (2014) 223 Cal.App.4th 645, 656-58, n. 8.

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mitigation strategies, (2) identifies the type of measures to be implemented, and (3) sets objective performance standards to ensure effectiveness.[45] Moreover, a lead agency may not rely on a corrective action plan to mitigate potential impacts of site contamination when the plan's mitigation measures are not disclosed in the record.[46] Here, the MND merely states that an SMP will be prepared in the future, without defining its specific components, remedial actions, or performance criteria. The lack of specificity renders the SMP unenforceable and fails to ensure that environmental impacts will be mitigated to less than significant.

A-9 Cont.

For these reasons, the MND's treatment of the SMP as a PDF rather than a mitigation measure violates CEQA. The City must properly characterize the SMP as a mitigation measure, conduct a full analysis of the project's soil contamination impacts, and establish clear, enforceable mitigation measures with defined performance standards to ensure compliance with CEQA.

B. The MND Lacks Substantial Evidence to Conclude the Project's Air Quality and Public Health Risks Are Less than Significant

The MND includes a health risk assessment ("HRA") to evaluate the health impacts on nearby receptors from exposure to toxic air contaminants ("TACs"), including diesel particulate matter ("DPM") during construction and emissions from haul trucks, the cooling tower, and the scrubber during operation. However, Dr. Clark identifies multiple critical deficiencies in the HRA that render its findings wholly unreliable. These flaws undermine the credibility of the risk assessment and fail to provide a scientifically valid basis for concluding that air quality and public health impacts would be less than significant. Substantial evidence provided by Dr. Clark shows the impacts may be significant, requiring the City to prepare an EIR to thoroughly analyze and mitigate the Project's significant health risks.

A-10

1. The Health Risk Assessment Fails to Use Readily Available Data from the On-Site Meteorological Station

The HRA fails to justify the selection of the meteorological data used for air dispersion modeling, despite Bay Area Air Quality Management District ("BAAQMD") guidance requiring the use of the most representative data available.

A-11

[45] CEQA Guidelines § 15126.4(a)(1)(B)
[46] *Citizens for Responsible Equitable Envt'l Dev. v. City of Chula Vista* (2011) 197 Cal.App.4th 327, 332.

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The HRA relies on meteorological data from the Concord-Buchanan Field,[47] an airport 12 miles west of the Project site, instead of using data from the on-site meteorological station.[48]

Meteorology, including prevailing wind speeds and directions, is critical in determining how pollutants disperse and where the greatest health risks occur.[49] Refined air dispersion models, such as AERMOD, rely on meteorological data to simulate pollutant transport.[50] BAAQMD maintains AERMOD-ready datasets for 35 sites in the Bay Area, including one at the Corteva industrial complex.[51] Despite the availability of on-site meteorological data, the HRA instead relies on data from 12 miles away from the Project site, which does not reflect site-specific conditions.[52]

CEQA requires that the lead agency accurately describe the baseline conditions against which the project's environmental impacts are measured.[53] By relying on meteorological data from a motoring station situated in an area with significantly different terrain, land uses, and weather patterns, the MND fails to establish the appropriate baseline, leading to a distorted assessment of potential impacts.

A-11 Cont.

Moreover, CEQA requires that an agency's conclusions be supported by substantial evidence, which excludes evidence that is clearly erroneous, inaccurate, or lacking a scientific basis.[54] Here the use of meteorological data from an unrelated location when site-specific data is readily available introduces fundamental errors that undermine the integrity of the MND's conclusions. Because the baseline conditions are misrepresented, the MND's impact analysis is

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[47] Clark Comments at p. 12; see also MND, appen. B.
[48] Clark Comments at p. 12.
[49] Bay Area Air Quality Management District, Air Quality Guidelines Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards (2022) p. E-35, *available at* https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?rev=b8917a27345a4a629fc18fc8650951e4&sc_lang=en.
[50] *Id*. at p. E-37.
[51] *Id*. at p. E-38; *see also* Bay Area Air Quality Management District, AERMOD-Ready Meteorological Data, https://www.baaqmd.gov/en/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/ceqa-modeling-data (last updated Nov. 15, 2022).
[52] Clark Comments at p. 12.
[53] CEQA Guidelines § 15125; *Communities for a Better Env't v. South Coast Air Quality Mgmt Dist.* (2010) 48 Cal.App.4th 310, 320 n. 5.
[54] *Id*. § 15384(a).

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A-11 Cont.

inherently flawed and cannot support the conclusion that air quality and health impacts are less than significant.

2. The Health Risk Assessment Fails to Apply Proper Age Sensitivity Factors Resulting in Underestimated Cancer Risk

Studies have shown that young people are more sensitive than adults to many carcinogens.[55] In response, OEHHA developed age sensitivity factors ("ASFs") to account for increased vulnerability to carcinogens during early-life exposure.[56] However, the HRA significantly underestimates cancer risks associated with diesel particulate matter (DPM) exposure during Project construction by using incorrect ASFs in its calculations.[57]

A-12

Specifically, the HRA uses an incorrect ASF of 4.75 for age 3 and completely omits any consideration of utero exposure.[58] In contrast, OEHHA recommends an ASF of 10 for the third trimester to age 2 and an ASF of 3 for ages 2 through 15.[59] By failing to apply these scientifically established factors, the MND grossly underestimates cancer risks for infants and children, who are the most vulnerable populations.[60] This omission fundamentally skews the risk assessment, leading to an inaccurate analysis and unsupported conclusion that exposure risks are insignificant.[61]

3. The Health Risk Assessment Fails to Justify a Reduction in Exposure Duration Which Leads to Underestimated Health Risks

The HRA assumes that off-site workers would be exposed to health risk for 250 days per year.[62] However, the MND states that the Project will operate 260 days per year at peak levels (24 hours per day, five days per week).[63] The City

A-13

[55] Office of Environmental Health Hazard Assessment, Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments (Feb. 2015) pp. 8-4 to 8-5 (hereinafter "OEHHA Guidance Manual"), *available at* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.
[56] *Ibid.*
[57] Clark Comments at p. 10-11.
[58] *Id.* at p. 11.
[59] Clark Comments at p. 11; OEHHA Manual at p. 8-5.
[60] Clark Comments at p. 11.
[61] *Ibid.*
[62] *Ibid.*; MND, appen. B.
[63] MND, appen. B.

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A-13 Cont.

offers no justification for why it reduces the exposure duration by 4 percent.[64] Because the HRA does not reflect the Project's true operational hours, the MND underestimates the cancer and hazard impacts to off-site workers. Consequently, the MND lacks substantial evidence to conclude this impact is less than significant.

4. The MND Lacks Substantial Evidence to Conclude Mitigation Measure AQ-2 Reduces Impacts to Less than Significant

The MND adopts Mitigation Measure AQ-2 to reduce health risk impacts associated with diesel particulate matter ("DPM") emissions from equipment operating during Project construction.[65] AQ-2 requires the use of EPA-certified Tier 4 Final engines for all construction equipment that exceeds 25 horsepower and are used at the site for more than 2 continuous days or 20 hours total.[66]

While Tier 4 Final equipment is available for purchase, it is newer, more costly, and less widely available.[67] If Tier 4 Final equipment is not available for Applicant's use during construction, DPM impacts may remain significant. However, the MND lacks evidence demonstrating that the Applicant has secured or will be able to procure Tier 4 equipment.[68] Without such assurance, the mitigation measure is unenforceable and ineffective.[69]

A-14

To ensure AQ provides real and feasible mitigation, Dr. Clark recommends that the MND require that the Applicant:

1. Demonstrate that the use of noncompliant construction equipment will not result in a significant impact. This demonstration must be based on emission calculations with written findings supported by substantial evidence that is approved by the City.
2. Adopt alternative strategies to the use of Tier 4 Final equipment, which may include reducing the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and

[64] Clark Comments at p. 11.
[65] MND at p. 26.
[66] *Id*. at pp. 25-26.
[67] Clark Comments at p. 5-6.
[68] *Id*. at p. 6.
[69] Pub. Res. Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2); *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 740 (agency improperly delayed implementing mitigation measure while project went forward).

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from the Project site, use cleaner vehicle fuel, or limiting the number of individual construciton project phases occurring simultaneously.

A-14 Cont.

3. Retrofit or repower lower tier equipment to meet Tier 4 Final standards by, for example, using equipment that has been retrofitted with diesel particulate traps or selective catalytic reduction on the next highest tier equipment available to achieve Tier 4 Final standards.

Without these safeguards, AQ-2 lacks enforceability and fails to ensure that DPM impacts will be reduced to less than significant.

C. The MND Lacks Substantial Evidence to Conclude Liquefication Impacts Are Insignificant

The MND acknowledges, and mapping confirms,[70] that the Project is in a seismic hazard zone.[71] Despite this, the MND dismisses liquefactions risks based on the assumption that the site is "likely" underlain by unconsolidated clay-sand-silt mixtures.[72] However, this assumption is not supported by soil borings or geotechnical studies specific to the site, rendering its conclusion speculative rather than based on substantial evidence.[73]

Instead of conducting a site-specific investigation, the MND improperly defers analysis of liquefication impacts to post-approval review by requiring a geotechnical investigation only after Project approval and prior to final design.[74] However, deferring this analysis to a later stage is inconsistent with CEQA's requirement that the environmental review document provide sufficient analysis to determine whether the project may result in significant impacts, including impacts from liquefaction.[75]

A-15

The MND also improperly defers the development of mitigation measures for liquefaction risks until after project approval. The MND states that geotechnical

[70] California Geological Survey, Earthquake Zones of Required Investigation Antioch North Quadrangle (Apr. 4, 2019).
[71] MND at p. 40.
[72] *Id*. at pp. 40-41.
[73] *Citizens Ass'n for Sensible Dev. v. County of Inyo* (1985) 172 Cal.App.3d 151, 171 (initial study should disclose the data or evidence supporting the study's environmental findings).
[74] MND at p. 41.
[75] CEQA Guidelines §§ 15063, 15070; *see also Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296; *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412.

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remedies would be required to avoid damage if liquification is identified and lists some potential remedies.[76] However, the MND fails to identify specific mitigation measures or performance standards.[77] This vague and non-committal approach deprives the public and decision-makers of the information necessary to evaluate the Project's actual environmental impacts before approval, in direct violation of CEQA's informational requirements.

A-15 Cont.

Given these deficiencies, the City lacks substantial evidence to conclude that the Project's liquefication impacts are less than significant. The City must conduct a comprehensive geotechnical analysis and identify performance standards for mitigation in an EIR before determining that liquefication risks are insignificant.

D. The MND Fails to Conduct the Required Hazardous Materials Assessment, Resulting in an Unsupported Land Use Consistency Determination

The MND's conclusion that the Project would not conflict with a land use plan, policy, or regulation adopted to mitigate environmental effects is unsupported by substantial evidence.[78] Specifically, the MND fails to demonstrate compliance with the City's 2040 General Plan goals, policies, and actions regarding hazardous materials, which require a thorough assessment and mitigation of contamination risks before redevelopment occurs.

A-16

The 2040 General Plan includes Goal-11-5, which is intended to minimize risk to life and property from the generation, storage, and transportation of hazardous materials and waste.[79] To achieve this goal, the 2040 General Plan requires that discretionary development applications provide detailed information on the historical use of hazardous materials, including potential past soil and groundwater contamination.[80] If contamination is identified, mitigation measures must be implemented to ensure the exposure risks are reduced to acceptable levels consistent with EPA and/or DTSC standards.[81] The 2040 General Plan EIR

[76] MND at p. 41.
[77] CEQA Guidelines § 15126.4(a)(1)(B).
[78] MND at p. 66.
[79] City of Pittsburg, Revised Adoption Draft: 2040 General Plan (Apr. 25, 2024) p. 11-13, *available at* https://www.pittsburgca.gov/home/showpublisheddocument/16189/638499779715030000.
[80] *Id.* at p. 11-14.
[81] *Ibid.*

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concluded that compliance with this requirement would reduce impacts related to hazardous materials to less-than-significant level.[82]

A-16 Cont.

Here, the MND does not provide detailed information on residual contamination from past industrial activities, nor does it identify mitigation as required by the 2040 General Plan. The record lacks substantial evidence that a comprehensive site assessment has been conducted or that mitigation measures meeting EPA and DTSC standards will be implemented before redevelopment. For example, the MND does not include a Phase I Environmental Site Assessment, meaning there is no systematic evaluation of the site's history, potential contamination sources, or the need for further investigation. Without this information, the MND's conclusion that the Project complies with applicable land use policies is unsubstantiated and legally deficient under CEQA.

IV. CONCLUSION

Substantial evidence supports a fair argument that the Project may have a significant health risk due to exposure to soil and groundwater contamination, necessitating the preparation of an EIR. The MND lacks substantial evidence to support its conclusions that impacts on air quality, public health, geology, hazards, and land use are less than significant. Additionally, the MND fails to adequately describe the existing environmental setting, which is a critical deficiency under CEQA. The MND also improperly defers hazard mitigation and includes insufficient air quality mitigation, failing to ensure meaningful environmental protection.

A-17

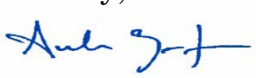
Given these deficiencies, the City must prepare an EIR evaluating and mitigating the Project's potentially significant environmental impacts, identify enforceable performance standards, and incorporate feasible mitigation measures, as required by CEQA. A full EIR is necessary to ensure informed decisionmaking and to safeguard the public and environmental health.

[82] City of Pittsburg, Draft Environmental Impact Report for the Pittsburg 2040 General Plan Update (Dec. 2023) pp. 3.8-29 to 3.8-30, *available at* https://www.pittsburgca.gov/home/showpublisheddocument/15671/638379669665730000; *see also* City of Pittsburg, Final Environmental Impact Report for the Pittsburg 2040 General Plan Update (Apr. 2024), *available at* https://www.pittsburgca.gov/home/showpublisheddocument/16112/638485347808600000.

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Thank you for your consideration of these comments.

Sincerely,



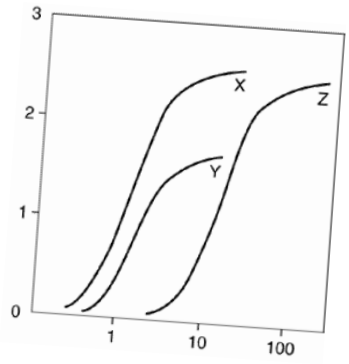
Andrew J. Graf

Attachment
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ATTACHMENT A



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A-18

February 21, 2025

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Attn: Mr. Andrew Graf

Subject: Comments On Draft Initial Study/Mitigated Negative Declaration For Pencco Iron Salts Manufacturing Facility, City of Pittsburg, California SCH No. 2025010603

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed materials related to Initial Study/Mitigated Negative Declaration (IS/MND) for the Pencco Iron Salts Manufacturing Facility prepared by the City of Pittsburg (the City).

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the plan. If we do not comment on a specific item this does not constitute acceptance of the item.

Project Description:

According to the IS/MND, the proposed project consists of: Use Permit and Design Review application for the Pencco Iron Salts Manufacturing Facility in the Corteva industrial complex located at 901 Loveridge Road, Pittsburg, California 94565. The Project site consists of a 1.38-acre (59,960.6 square feet) property leased from Corteva (APN #073-220-049, Lot L8). The parcel (073-220-049, Lot L8) is zoned General Industrial (IG) and is designated Industrial in the City of Pittsburg 2040 General Plan. The proposed development project will result in an iron salts manufacturing facility to relieve Northern California iron salts supply issues. The manufacturing process involves

dissolving iron ore and high-purity scrap iron with chlorine and hydrochloric Acid (HCL). These processes occur in reactors designed for the corrosive nature of this process. Pencco would ship finished products such as ferrous chloride, ferric chloride, and ferric sulfate from the facility by tanker trucks and railcars to California's water treatment and wastewater treatment plants.

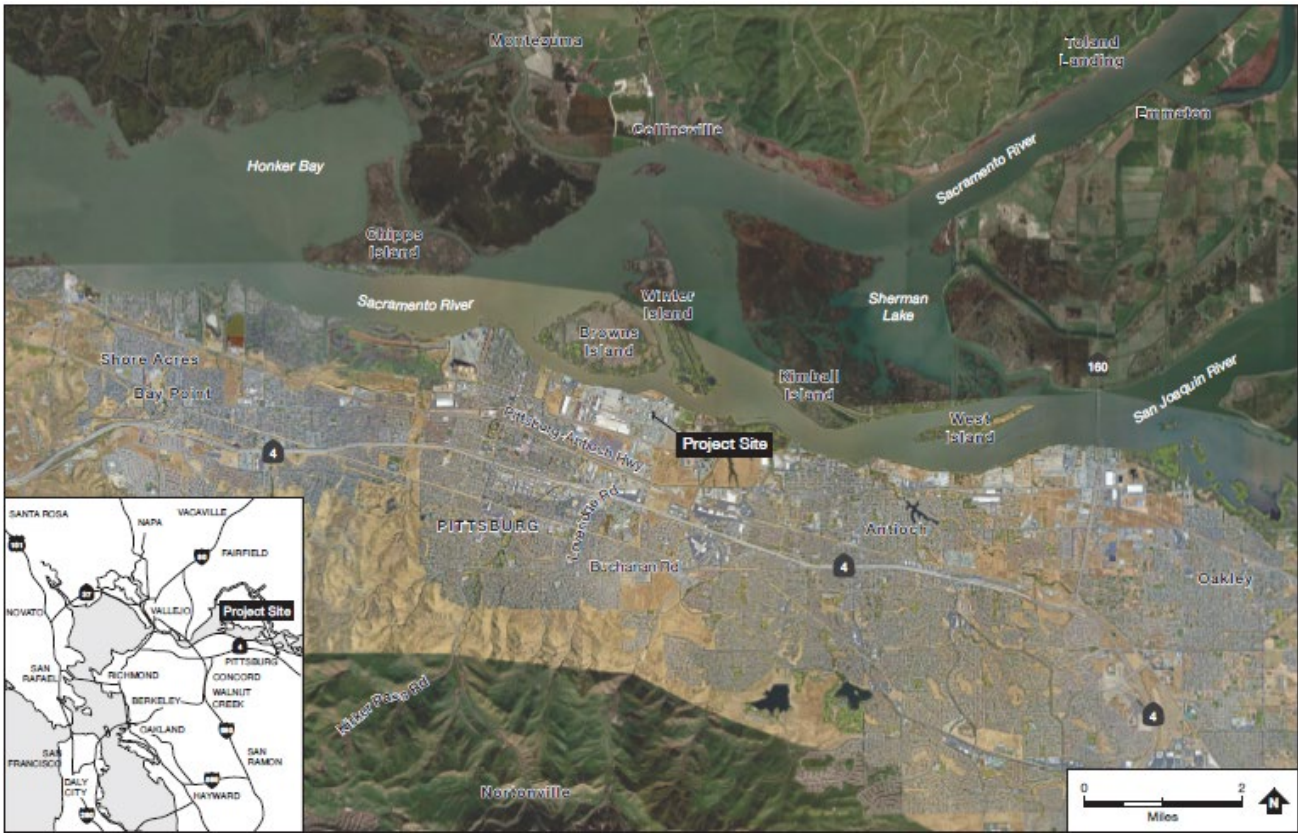


Figure 1: Regional Location Map

A-18 Cont.

The total Corteva Agriscience facility consists of approximately 500 acres, about half of which is undeveloped. According to the IS/MND[1], the manufacturing portion of the facility would be located outdoors, and no new buildings are included with the Project. The manufacturing process involves dissolving iron ore and high-purity scrap iron with chlorine and hydrochloric Acid (HCl). These processes occur in reactors designed for the corrosive nature of this process. The iron salts manufactured at the proposed facility would be shipped to California's water treatment and wastewater treatment plants.

[1] RCH Group. 2025. Pencco Iron Salts Manufacturing Facility Draft Initial Study/Mitigated Negative Declaration. January 2025. Pg. 5



Figure 2: Proposed Project Site Plan

A-18 Cont.

The facility would utilize the existing buildings onsite for a control lab and office building and a maintenance building with additional office space. The remainder of the Project site would consist of a containment area for the manufacturing process (described in detail below), an open truck parking lot with truck loading and scales, and automobile parking with associated landscaping. Major facility components would consist of:

- 10 reactor tanks ranging from 10 to 13 feet in diameter and 16 to 20 feet in height (volume ranging from 10,000 to 24,000 gallons)
- 18 storage tanks ranging from 8 to 25 feet in diameter and 10 to 30 feet in height (volume ranging from 4,000 to 100,000 gallons)
- Two-stage air scrubber components including water and caustic scrubber, scrubber fan, and stack (20 feet tall) ranging from 2.7 to 6 feet in diameter
- Cooling Tower (12 feet in diameter and 10 feet in height)
- Filter press, ore and scrap containment areas, overhead crane, air compressor, and sump pump drains.

Process emissions would be emitted through one stack for the entire facility, which would be driven through the stack by the air scrubber fan. The fan would pull fugitive emissions from the processes into a packed-bed column scrubber permitted by the Bay Area Air Quality Management District (BAAQMD).

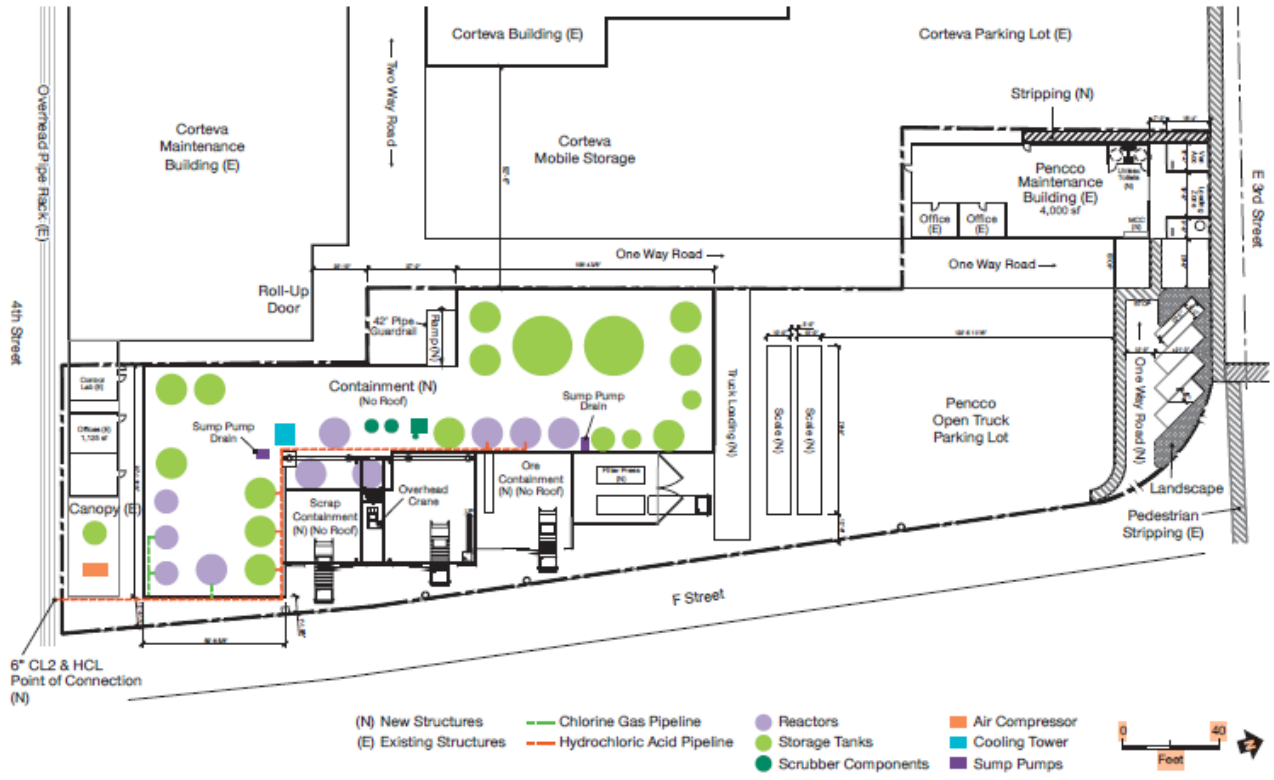


Figure 3: Project Site Plan

A-18 Cont.

The IS/MND[2] states that "[t]he nearest residences are approximately one mile southwest of the Project site along Columbia Street. The nearest school, Martin Luther King Jr. Junior High School, is approximately 1.1 miles southwest of the Project site. The nearest park, Central Park, is approximately one mile southwest of the Project site."

Construction of the Project would occur intermittently over approximately 14 months from May 2025 through July 2026. Construction activities would typically take place Monday through Friday, 8 a.m. to 5 p.m. Construction of the Project would require demolition, site preparation, grading, building construction/equipment installation, paving, and architectural coating. Construction would

[2] *Ibid.* Pg. 2

require the export of 16,000 cubic yards of soil to make room for the recessed concrete containment floor. Demolition would consist of removing 27,000 square feet of existing pavement to make room for the new concrete containment area and truck scales. New paving would consist of 26,000 square feet of pavement and 1,000 square feet of asphalt for the new concrete containment area. Since the Project Site is in the middle of an industrial site with a long history of operation, there is a potential that soil underlying area proposed for construction have been impacted with contaminants that could represent a threat to human health of the environment.

A-18 Cont.

Pencco estimated that they would staff the facility with ten operators, ten truck drivers, and five managers and engineers. Most of the labor for the Project would come from local contract construction workers. At peak, the facility would operate 24 hours per day, five days per week (260 days per year). Project operations would require one propane-powered forklift, one propane-powered manlift, and one gasoline-powered skid steer, each operating an average of 2 hours per day.

Specific Comments

1. Mitigation Measure AQ-2 Does Not Ensure Air Quality Impacts Are Reduced to Less than Significant Levels

The IS/MND found the project would have less-than significant impacts with mitigation in the areas of Air Quality and Mandatory Findings of Significance. Mitigation measures (for air) included in the IS/MND to reduce all impacts to a less-than-significant level:

A-19

1. Mitigation Measure AQ-1 requires the Applicant to implement BAAQMD's Basic Best Management Practices for fugitive dust.
2. Mitigation Measure AQ-2 requires the Applicant to implement Tier 4 Final Equipment for diesel construction equipment greater than 25 horsepower that will be used more than two continuous days or 20 hours total during the construction period.

While Mitigation Measure AQ-2 will reduce particulate emissions (PM10 and PM2.5) from the offroad construction equipment, the IS/MND fails to address the issue of the availability of all the equipment. The IS/MND assumes that Tier 4 equipment (specifically Tier 4 final) is available for all off-road equipment used on site during the construction phases of the project, without demonstrating that procuring Tier 4 equipment will be feasible. While Tier 4 equipment is available for purchase, it

is new technology that is more costly than older technologies and has less availability. The IS/MND lacks supporting evidence to demonstrate that the Proponent has, or will be able to, procure Tier 4 equipment for Project construction.

Based upon a review of public records of the California Air Resources Board's (CARB) Diesel Off-Road Online Reporting System (DOORS),[3] it is evident that the availability of Tiered construction equipment is highly dependent on the type of equipment. If the Proponent cannot acquire the necessary equipment during construction or delay the construction until the equipment is available, project construction could be substantially delayed while the Proponent searches for Tier equipment to comply with their stated commitment. That conclusion in the IS/MND that emissions will remain below the significance thresholds based on the use of Tier 4 final equipment is not born out in the analysis of the IS/MND.

A-19 Cont.

In the event Tier 4 Final construction equipment is not available for all required equipment when it is need, the Project representative or contractor must:

1. Demonstrate that the use of noncompliant construciton equipment will not result in a significant impact. This demonstration must be based on emission calculations with written findings supported by substantial evidence that is approved by the City.
2. Adopt alternative strategies to the use of Tier 4 Final equipment, which may include reducing the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Project site, use cleaner vehicle fuel, or limiting the number of individual construciton project phases occurring simultaneously.
3. Retrofit or repower lower tier equipment to meet Tier 4 Final standards by, for example, using equipment that has been retrofitted with diesel particulate traps or selective catalytic reduction on the next highest tier equipment available to achieve Tier 4 Final standards.

2. The IS/MND Fails To Analyze Vapor Intrusion Risks to Onsite Workers From The Existing Subsurface Contamination At The Corteva Site.

A-20

The IS/MND fails to assess the potential exposure of onsite workers to hazardous vapors intruding into the construction site from known contamination sources at the site. According to the

[3] Accessed January 20, 2020

Department of Toxic Substances Control's (DTSC's) Envirostor, the project site is within the Corteva industrial complex (formerly Dow Chemical Company) that has a documented history of hazardous material use and contamination. The Corteva facility has three DTSC permits: a Hazardous Waste Facility Post-Closure Permit for the area known as the Monofill Landfill (Monofill), a Hazardous Waste Facility Permit for the Block 560 Drum Storage Area and a Hazardous Waste Facility Permit for Boilers and Industrial Furnaces.

The Dow Chemical Company (Dow) owned and operated the industrial complex from 1938 until March 31, 2019. On April 1, 2019, the name of the former Dow Pittsburg facility was changed to Corteva Agriscience Pittsburg Operations, and the owner/operator name was changed to Dow AgroSciences LLC. On January 1, 2021, the legal entity name of the owner/operator for the facility was changed to Corteva Agriscience LLC. Corteva Agriscience LLC owns approximately 700 acres, consisting of approximately 500 acres of industrial complex and 200 acres of undeveloped wetlands and riparian zones. The IS/MND lacks any evidence of the soil conditions and existing contamination at the Project Site. Additionally, the IS/MND notes that the area of Pittsburg that contains the Project site has been evaluated by the California Geological Survey (CGS) and is zoned as a liquefaction hazard zone. The lack of information on the site conditions and is a significant flaw in the analysis of potential risks to construction workers and workers involved in the operations of the Project Site.

A-20
Cont.

The industrial complex has historically been used for production of chlorine, sodium hydroxide, hydrogen, and chlorinated solvents such as carbon tetrachloride and tetrachlorethylene (PCE). The site continues to manufacture latex, agricultural chemicals, fumigants, fungicides, and hydrochloric acid. Groundwater monitoring data from the wells closest to the Project site (408B1 and 424C) indicate the presence of multiple hazardous contaminants, including carcinogens such as cis-1,2-dichloroethene, trichloroethene (TCE), PCE, methylene chloride, carbon tetrachloride, chloroform, vinyl chloride, and benzene.

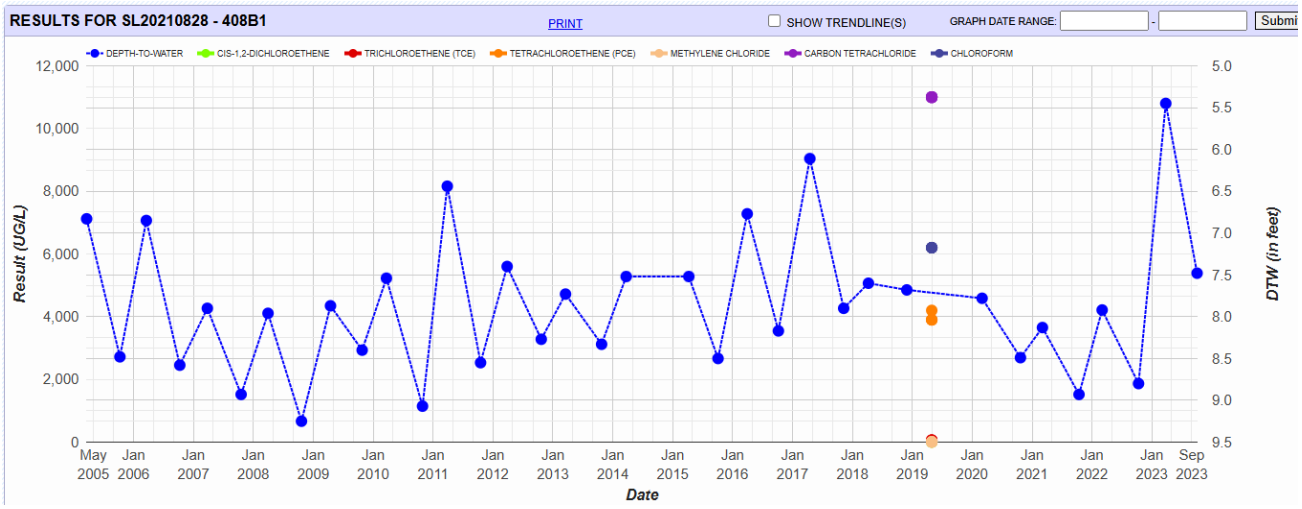


Figure 4: State Water Resources Control Board Summary of Measurements At Well 408B1

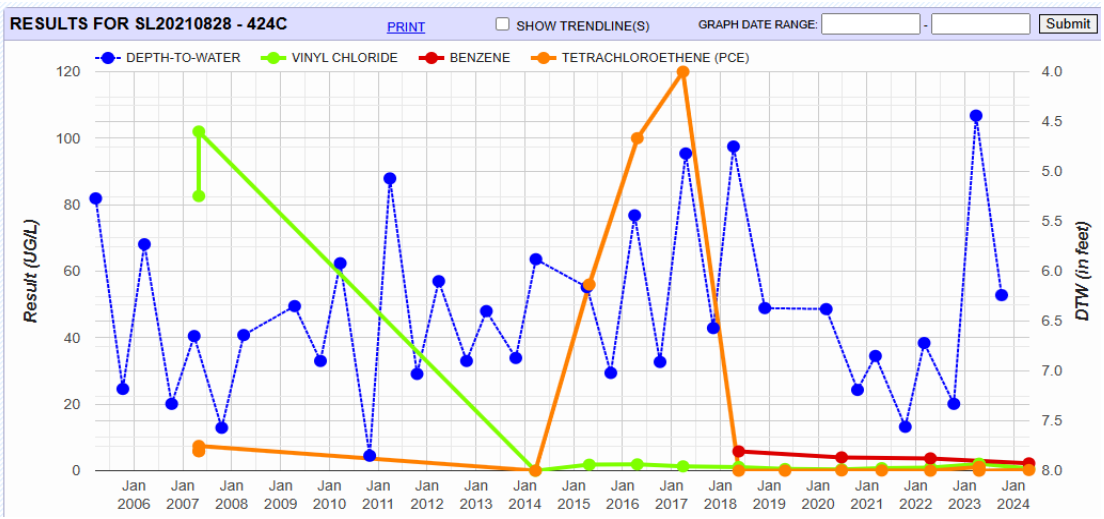


Figure 5: State Water Resources Control Board Summary of Measurements At Well 424C

A-20 Cont.

According to the State Water Resources Control Board's GeoTracker website, the current concentration of PCE in the shallow wells nearest the Project Site were measured at 4,200 ug/L in Well 408B1, 120 ug/L at Well 424C, and 130 ug/L at Well 424B. The concentrations of TCE in

Wells 408B1, 424C, and 424B were measured at 66 ug/l, 482 ug/L, and 14 ug/L, respectively.



A-20 Cont.

Figure 6: PCE Measurements In Shallow Groundwater

Many of these chemicals have been detected at concentrations exceeding DTSC's screening thresholds for water. DTSC's environmental screening levels are screening levels for chemicals found at sites with contaminated soil or groundwater that are designed to be protective of human health. Based on DTSC's latest Johnson-Ettinger Vapor Intrusion Model the target range of concentrations for TCE in groundwater (to prevent excessive risk from vapor intrusion) is 64 micrograms per liter (ug/L) to 160 ug/L. The target range of concentrations for PCE is 790 ug/L to 1600 ug/L. From the graphs below of measured PCE concentrations in the closest groundwater wells to the Project Site, it is evident that the measured concentration of PCE is well in excess of the target range (4200 ug/L compared to 1600 ug/L).

Despite the presence of these contaminants near the Project site at concentrations exceeding screening levels, the IS/MND fails to analyze the potential for vapor intrusion into indoor workspaces. Vapor intrusion occurs when volatile chemicals migrate from contaminated soil or groundwater into overlying buildings, posing significant health risks. Given the documented high concentrations of PCE near the Project site, workers in the proposed offices and maintenance building could be exposed to harmful indoor air contamination during Project operation. A thorough analysis of this risk is necessary to ensure worker safety.

A-20 Cont. The City must include an analysis of the vapor intrusion from known sources of contamination onsite in an EIR of the Project.

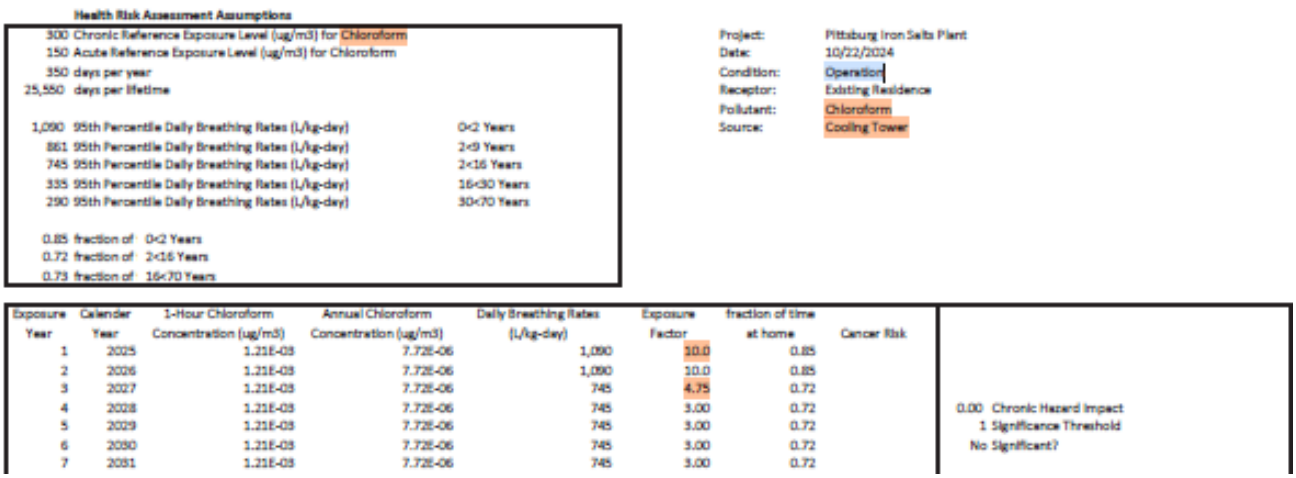
3. The HRA Included In The IS/MND Uses An Atypical Age Sensitivity Factors, Non-Standard Exposure Durations, And Contradictory Meteorological Data.

The health risk assessment (HRA) presented in the IS/MND significantly underestimates cancer risks associated with diesel particulate matter (DPM) exposure by using incorrect age sensitivity factors (ASFs) and an unjustified reduction in worker exposure duration. These methodologies violate the Office of Environmental Health Hazard Assessment's (OEHHA's) 2015 Toxic Hot Spots Guidance Manual (Manual) and misrepresent the potential health risks.

First, the IS/MND misapplies ASFs in its cancer risk calculations, directly contradicting OEHHA guidance. To calculate the inhalation cancer risk for any receptor in the modeling domain
A-21 dose of the chemical in air ($Dose_{air}$) is calculated from the annual concentration of the carcinogen (C_{air}). The exposure concentration is then multiplied by the breathing rate per body weight (BR/BW), inhalation absorption factor (A), the exposure frequency (days per 365 days) and a conversion factor of 10^{-6} (micrograms to milligrams, liters to cubic meters). This annual average concentration is multiplied by the cancer slope (CPF) for the chemical along with the appropriate age sensitivity factor (ASF) the exposure duration (ED) and then divided by the averaging time (AT).

1. $$Dose_{air} = C_{air} * \{BR/BW\} * A * EF * 10^{-6}$$

2. $$Risk_{inh} = Dose_{air} * CPF * ASF * ED/AT$$



Health Risk Assessment Assumptions

300	Chronic Reference Exposure Level (ug/m3) for Chloroform	
150	Acute Reference Exposure Level (ug/m3) for Chloroform	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of	0<2 Years
0.72	fraction of	2<16 Years
0.73	fraction of	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	10/22/2024
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	Chloroform
Source:	Cooling Tower

Exposure Year	Calender Year	1-Hour Chloroform Concentration (ug/m3)	Annual Chloroform Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2025	1.21E-03	7.72E-06	1,090	10.0	0.85	
2	2026	1.21E-03	7.72E-06	1,090	10.0	0.85	
3	2027	1.21E-03	7.72E-06	745	4.75	0.72	
4	2028	1.21E-03	7.72E-06	745	3.00	0.72	
5	2029	1.21E-03	7.72E-06	745	3.00	0.72	
6	2030	1.21E-03	7.72E-06	745	3.00	0.72	
7	2031	1.21E-03	7.72E-06	745	3.00	0.72	

0.00 Chronic Hazard Impact
1 Significance Threshold
No Significant?

Figure 7: Exposure Factors Used In HRA

A-21 Cont.

The Manual requires an ASF of 10 for the third trimester to age 2 years and an ASF of 3 for ages 2 through 15 years to account for potential increased vulnerability of young children to carcinogens. However, as shown in the table above, the IS/MND arbitrarily assigns an ASF of 4.75 for age 3 and completely omits any consideration of in utero exposure. By failing to apply the appropriate ASFs, the IS/MND grossly underestimates cancer risks for infants and young children, who are the most vulnerable populations. This omission fundamentally skews the risk assessment, leading to an inaccurate assessment and misleading conclusion that exposure risks are significant

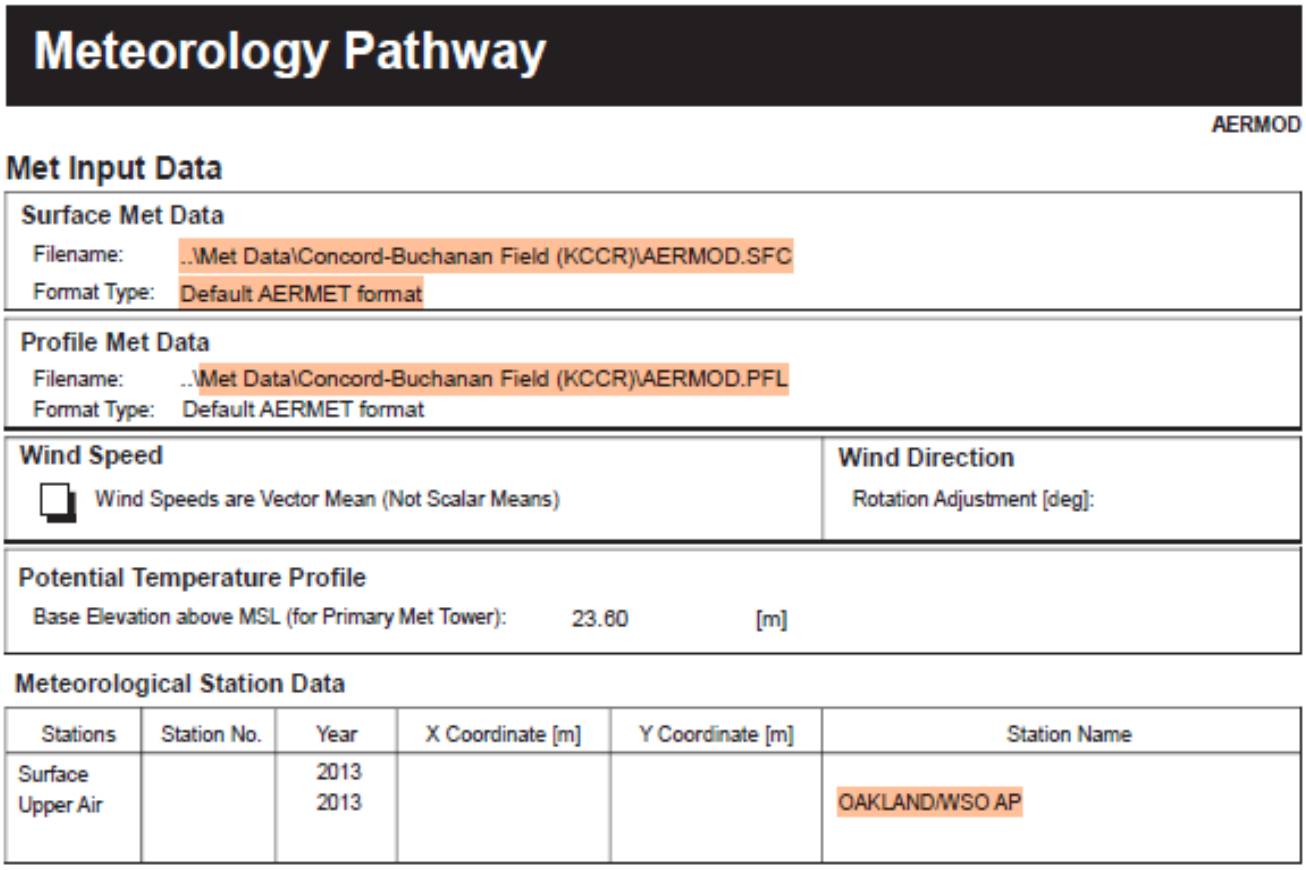
Table 8.3 Age Sensitivity Factors by Age Group for Cancer Risk Assessment

Age Group	Age Sensitivity Factor (unitless)
3rd Trimester	10
0<2 years	10
2<9 years	3
2<16 years	3
16<30 years	1
16-70 years	1

A-22

Second, the IS/MND artificially reduces the exposure duration assumption for off-site workers, further distorting the risk analysis. The project will operate 260 days per year at peak levels (24 hours per day, five days per week), yet the IS/MND assumes only 250 days of exposure per year for off-site workers without any justification. This discrepancy lowers the estimated hazard risks and fails to reflect the full extent of exposure for workers in the surrounding area. The City offers no explanation for why it reduces the exposure duration by 4%, despite acknowledging the facility's true operating schedule.

Third, the dispersion model utilized in the analysis of risks from exposure to emissions has contradictory meteorological data. On page RE1-9 of the IS/MND the summary of the meteorological data shows two different meteorological stations. Under the Input Data Section a file from the Concord-Buchanan Field (call letters KCCR) is listed. KCCR is located approximately 13 miles to the west of Project Site. Further down the summary, the Oakland International Airport is located approximately 43 miles to the southwest of the Project Site.



Meteorology Pathway

AERMOD

Met Input Data

Surface Met Data

Filename: ..\Met Data\Concord-Buchanan Field (KCCR)\AERMOD.SFC

Format Type: Default AERMET format

Profile Met Data

Filename: ..\Met Data\Concord-Buchanan Field (KCCR)\AERMOD.PFL

Format Type: Default AERMET format

Wind Speed

☐ Wind Speeds are Vector Mean (Not Scalar Means)

Wind Direction

Rotation Adjustment [deg]:

Potential Temperature Profile

Base Elevation above MSL (for Primary Met Tower): 23.60 [m]

Meteorological Station Data

Stations	Station No.	Year	X Coordinate [m]	Y Coordinate [m]	Station Name
Surface		2013			
Upper Air		2013			OAKLAND/WSO AP

Figure 8: Meteorological Pathway Summary

A-23

The most appropriate data set to be used for modeling emissions from the Project Site would be the data generated at the Corteva facility.

Given these critical errors and omissions, the IS/MND does not provide substantial evidence to support its conclusion that DPM-related cancer risks are less than significant. The City must revise the HRA using OEHHA's correct ASF values, apply an accurate worker exposure duration, and disclose the true health risks in an EIR.

4. The IS/MND Fails To Address Quantitatively The Potential For Accidental Risks Of Chlorine Releases To Reach Sensitive Receptors.

The IS/MND asserts that potential chlorine releases from the Project site would be less than significant yet fails to support its claim with a quantitative risk assessment for chlorine gas exposure. The Project will handle 40 million pounds of chlorine annually, presenting a clear potential for accidental release. However, the IS/MND only provides an analysis for hydrogen chloride (HCl) emissions – not chlorine gas – and concludes that the highest offsite concentration modeled for HCl (4.01 ug/m^3) is below OEHHA's chronic reference level. This analysis is inadequate and misleading because OEHHA's chronic reference level for chlorine gas at 0.2 ug/m^3, which is twenty times lower than the modeled concentration presented in the IS/MND. The IS/MND does not evaluate whether the potential chlorine gas releases would exceed this threshold, nor does it model scenarios for chlorine vapor dispersion.

A-24

Given the massive chlorine inventory on-site and the potential for hazardous release, a quantitative risk assessment is required. The City must assess the dispersion and potential public health risks of chlorine gas release using the U.S. EPA's Areal Locations of Hazardous Atmospheres (ALOHA) model, a standard tool for assessing toxic gas clouds.[4] The results of the analysis must be presented in an EIR.

Conclusion

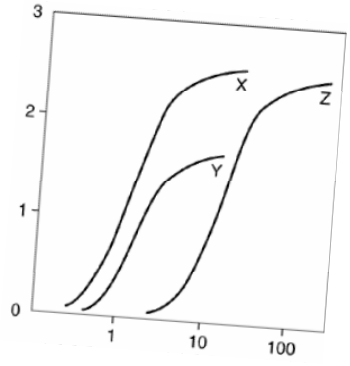
The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant impacts if allowed to proceed. A draft environmental impact report should be prepared to address these substantial concerns.

A-25

Sincerely,



[4] https://www.epa.gov/cameo/aloha-software; https://response.restoration.noaa.gov/sites/default/files/aloha.pdf.



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James J. J. Clark, Ph.D.

Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well recognized toxicologist, air modeler, and health scientist. He has 20 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

Significant projects performed by Dr. Clark include the following:

LITIGATION SUPPORT

Case: James Harold Caygle, et al, v. Drummond Company, Inc. Circuit Court for the Tenth Judicial Circuit, Jefferson County, Alabama. Civil Action. CV-2009

Client: Environmental Litgation Group, Birmingham, Alabama

Dr. Clark performed an air quality assessment of emissions from a coke factory located in Tarrant, Alabama. The assessment reviewed include a comprehensive review of air quality standards, measured concentrations of pollutants from factory, an inspection of the facility and detailed assessment of the impacts on the community. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Rose Roper V. Nissan North America, et al. Superior Court of the State Of California for the County Of Los Angeles – Central Civil West. Civil Action. NC041739

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to multiple chemicals, including benzene, who later developed a respiratory distress. A review of the individual's medical and occupational history was performed to prepare an exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to respiratory irritants. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: O'Neil V. Sherwin Williams, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to petroleum distillates who later developed a bladder cancer. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Summary judgment for defendants.

Case: Moore V., Shell Oil Company, et al. Superior Court of the State Of California for the County Of Los Angeles

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to chemicals while benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Raymond Saltonstall V. Fuller O'Brien, KILZ, and Zinsser, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Richard Boyer and Elizabeth Boyer, husband and wife, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-7G.

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: JoAnne R. Cook, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-9R

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of an individual exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Patrick Allen And Susan Allen, husband and wife, and Andrew Allen, a minor, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-W

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Michael Fahey, Susan Fahey V. Atlantic Richfield Company, et al. United States District Court Central District of California Civil Action Number CV-06 7109 JCL.

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Constance Acevedo, et al., V. California Spray-Chemical Company, et al., Superior Court of the State Of California, County Of Santa Cruz. Case No. CV 146344

Dr. Clark performed a comprehensive exposure assessment of community members exposed to toxic metals from a former lead arsenate manufacturing facility. The former manufacturing site had undergone a DTSC mandated removal action/remediation for the presence of the toxic metals at the site. Opinions were presented regarding the elevated levels of arsenic and lead (in attic dust and soils) found throughout the community and the potential for harm to the plaintiffs in question.

Case Result: Settlement in favor of defendant.

Case: Michael Nawrocki V. The Coastal Corporation, Kurk Fuel Company, Pautler Oil Service, State of New York Supreme Court, County of Erie, Index Number I2001-11247

Client: Richard G. Berger Attorney At Law, Buffalo, New York

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the

known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Judgement in favor of defendant.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model will be used to estimate acute and chronic exposure concentrations to multiple contaminants and will be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

Client – Los Angeles Alliance for a New Economy (LAANE), Los Angeles, California

Dr. Clark is advising the LAANE on air quality issues related to current flight operations at the Los Angeles International Airport (LAX) operated by the Los Angeles World Airport (LAWA) Authority. He is working with the LAANE and LAX staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client – City of Santa Monica, Santa Monica, California

Dr. Clark is advising the City of Santa Monica on air quality issues related to current flight operations at the facility. He is working with the City staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client: Omnitrans, San Bernardino, California

Dr. Clark managed a public health survey of three communities near transit fueling facilities in San Bernardino and Montclair California in compliance with California Senate Bill 1927. The survey included an epidemiological survey of the effected communities, emission surveys of local businesses, dispersion modeling to determine potential emission concentrations within the communities, and a comprehensive risk assessment of each community. The results of the study were presented to the Governor as mandated by Senate Bill 1927.

Client: Confidential, San Francisco, California

Summarized cancer types associated with exposure to metals and smoking. Researched the specific types of cancers associated with exposure to metals and smoking. Provided causation analysis of the association between cancer types and exposure for use by non-public health professionals.

Client: Confidential, Minneapolis, Minnesota

Prepared human health risk assessment of workers exposed to VOCs from neighboring petroleum storage/transport facility. Reviewed the systems in place for distribution of petroleum hydrocarbons to identify chemicals of concern (COCs), prepared comprehensive toxicological summaries of COCs, and quantified potential risks from carcinogens and non-carcinogens to receptors at or adjacent to site. This evaluation was used in the support of litigation.

Client – United Kingdom Environmental Agency

Dr. Clark is part of team that performed comprehensive evaluation of soil vapor intrusion of VOCs from former landfill adjacent residences for the United Kingdom's Environment

Agency. The evaluation included collection of liquid and soil vapor samples at site, modeling of vapor migration using the Johnson Ettinger Vapor Intrusion model, and calculation of site-specific health based vapor thresholds for chlorinated solvents, aromatic hydrocarbons, and semi-volatile organic compounds. The evaluation also included a detailed evaluation of the use, chemical characteristics, fate and transport, and toxicology of chemicals of concern (COC). The results of the evaluation have been used as a briefing tool for public health professionals.

EMERGING/PERSISTENT CONTAMINANT RESEARCH/PROJECTS

Client: Ameren Services, St. Louis, Missouri

Managed the preparation of a comprehensive human health risk assessment of workers and residents at or near an NPL site in Missouri. The former operations at the Property included the servicing and repair of electrical transformers, which resulted in soils and groundwater beneath the Property and adjacent land becoming impacted with PCB and chlorinated solvent compounds. The results were submitted to U.S. EPA for evaluation and will be used in the final ROD.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark is managing the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Immanent and Substantial Endangerment Order. Dr. Clark is assisting the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of perchlorate in environment. Dr. Clark evaluated the production, use, chemical characteristics, fate and transport, toxicology, and remediation of perchlorate. Perchlorates form the basis of solid rocket fuels and have recently been detected in water supplies in the United States. The results of this research

were presented to the USEPA, National GroundWater, and ultimately published in a recent book entitled *Perchlorate in the Environment*.

Client – Confidential, Los Angeles, California

Dr. Clark is performing a comprehensive review of the potential for pharmaceuticals and their by-products to impact groundwater and surface water supplies. This evaluation will include a review if available data on the history of pharmaceutical production in the United States; the chemical characteristics of various pharmaceuticals; environmental fate and transport; uptake by xenobiotics; the potential effects of pharmaceuticals on water treatment systems; and the potential threat to public health. The results of the evaluation may be used as a briefing tool for non-public health professionals.

PUBLIC HEALTH/TOXICOLOGY

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential, San Francisco, California

Identified and analyzed fifty years of epidemiological literature on workplace exposures to heavy metals. This research resulted in a summary of the types of cancer and non-cancer diseases associated with occupational exposure to chromium as well as the mortality and morbidity rates.

Client: Confidential, San Francisco, California

Summarized major public health research in United States. Identified major public health research efforts within United States over last twenty years. Results were used as a briefing tool for non-public health professionals.

Client: Confidential, San Francisco, California

Quantified the potential multi-pathway dose received by humans from a pesticide applied indoors. Part of team that developed exposure model and evaluated exposure concentrations in a comprehensive report on the plausible range of doses received by a specific person. This evaluation was used in the support of litigation.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client – United Kingdom Environmental Agency

Oversaw a comprehensive toxicological evaluation of methyl-*tertiary* butyl ether (M*t*BE) for the United Kingdom's Environment Agency. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of M*t*BE. The results of the evaluation have been used as a briefing tool for public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of *tertiary* butyl alcohol (TBA) in municipal drinking water system. TBA is the primary breakdown product of M*t*BE, and is suspected to be the primary cause of M*t*BE toxicity. This evaluation will include available information on the production, use, chemical characteristics, fate and transport in the environment, absorption, distribution, routes of detoxification, metabolites, carcinogenic potential, and remediation of TBA. The results of the evaluation were used as a briefing tool for non-public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of methyl *tertiary* butyl ether (MTBE) in municipal drinking water system. MTBE is a chemical added to gasoline to increase the octane

rating and to meet Federally mandated emission criteria. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MTBE. The results of the evaluation have been were used as a briefing tool for non-public health professionals.

Client – Ministry of Environment, Lands & Parks, British Columbia

Dr. Clark assisted in the development of water quality guidelines for methyl tertiary-butyl ether (MTBE) to protect water uses in British Columbia (BC). The water uses to be considered includes freshwater and marine life, wildlife, industrial, and agricultural (e.g., irrigation and livestock watering) water uses. Guidelines from other jurisdictions for the protection of drinking water, recreation and aesthetics were to be identified.

Client: Confidential, Los Angeles, California

Prepared physiologically based pharmacokinetic (PBPK) assessment of lead risk of receptors at middle school built over former industrial facility. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Client: Confidential, Atlanta, Georgia

Researched potential exposure and health risks to community members potentially exposed to creosote, polycyclic aromatic hydrocarbons, pentachlorophenol, and dioxin compounds used at a former wood treatment facility. Prepared a comprehensive toxicological summary of the chemicals of concern, including the chemical characteristics, absorption, distribution, and carcinogenic potential. Prepared risk characterization of the carcinogenic and non-carcinogenic chemicals based on the exposure assessment to quantify the potential risk to members of the surrounding community. This evaluation was used to help settle class-action tort.

Client: Confidential, Escondido, California

Prepared comprehensive Preliminary Endangerment Assessment (PEA) of dense non-aqueous liquid phase hydrocarbon (chlorinated solvents) contamination at a former printed circuit board manufacturing facility. This evaluation was used for litigation support and may be used as the basis for reaching closure of the site with the lead regulatory agency.

Client: Confidential, San Francisco, California

Summarized epidemiological evidence for connective tissue and autoimmune diseases for product liability litigation. Identified epidemiological research efforts on the health effects of medical prostheses. This research was used in a meta-analysis of the health effects and as a briefing tool for non-public health professionals.

Client: Confidential, Bogotá, Columbia

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of a 13.7 hectares plastic manufacturing facility in Bogotá, Colombia The risk assessment was used as the basis for the remedial goals and closure of the site.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally cadmium) and VOCs from soil and soil vapor at 12-acre former crude oilfield and municipal landfill. The site is currently used as a middle school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and was used as the basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Managed remedial investigation (RI) of heavy metals and volatile organic chemicals (VOCs) for a 15-acre former manufacturing facility. The RI investigation of the site included over 800 different sampling locations and the collection of soil, soil gas, and groundwater samples. The site is currently used as a year round school housing approximately 3,000 children. The Remedial Investigation was performed in a manner

that did not interrupt school activities and met the time restrictions placed on the project by the overseeing regulatory agency. The RI Report identified the off-site source of metals that impacted groundwater beneath the site and the sources of VOCs in soil gas and groundwater. The RI included a numerical model of vapor intrusion into the buildings at the site from the vadose zone to determine exposure concentrations and an air dispersion model of VOCs from the proposed soil vapor treatment system. The Feasibility Study for the Site is currently being drafted and may be used as the basis for granting closure of the site by DTSC.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally lead), VOCs, SVOCs, and PCBs from soil, soil vapor, and groundwater at 15-acre former manufacturing facility. The site is currently used as a year round school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and will be basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of VOC vapor intrusion into classrooms of middle school that was former 15-acre industrial facility. Using the Johnson-Ettinger Vapor Intrusion model, the evaluation determined acceptable soil gas concentrations at the site that did not pose health threat to students, staff, and residents. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client –Dominguez Energy, Carson, California

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of 6-acre portion of a 500-acre oil and natural gas production facility in Carson, California. The risk assessment was used as the basis for closure of the site.

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)
Association for Environmental Health and Sciences (AEHS)
American Chemical Society (ACS)
California Redevelopment Association (CRA)
International Society of Environmental Forensics (ISEF)
Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

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Clark, J.J.J. 2001. "TBA: Chemical Properties, Production & Use, Fate and Transport, Toxicology, Detection in Groundwater, and Regulatory Standards" in *Oxygenates in the Environment.* Art Diaz, Ed.. Oxford University Press: New York.

Clark, J.J.J. 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment.* Edward Urbansky, Ed. Kluwer/Plenum: New York.

Clark, J.J.J. 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.

Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

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Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equialency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. Organohalogen Compounds, Volume 70 (2008) page 002254.

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Rosenfeld, P.E., **Clark, J. J.,** Hensley, A.R., and Suffet, I.H. 2007. "The Use Of An Odor Wheel Classification For The Evaluation of Human Health Risk Criteria For Compost Facilities" Water Science & Technology. 55(5): 345-357.

Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. "The Value Of An Odor Quality Classification Scheme For Urban Odor" WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.

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Clark, J.J.J., Brown, A., Rodriguez, R. 1998. The Public Health Implications of MtBE and Perchlorate in Water: Risk Management Decisions for Water Purveyors. Proceedings of the National Ground Water Association, Anaheim, CA, June 3-4, 1998.

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Response to Comment A-1

See Response to Comment A-7 through A-25.

Response to Comment A-2

Comment Noted. The comment provides Project and introductory information.

Response to Comment A-3

See Response to Comment A-7 through A-25.

Response to Comment A-4

Comment Noted. The comment provides information regarding SAFER CA.

Response to Comment A-5

Comment Noted. The comment provides information regarding the CEQA "Fair Argument Standard" for preparation of an Environmental Impact Report.

Response to Comment A-6

Comment Noted. The comment provides information regarding the "Substantial Evidence" under CEQA and disagreement upon experts.

Response to Comment A-7

The analysis conducted for the Draft IS/MND found no evidence indicating that the Project site currently, or previously, supported operations that could have caused soil and groundwater contamination beneath the parcel. The Corteva Agriscience Industrial Complex (Corteva property) has been involved in chemical use and production for many decades and is included on the "Cortese List" due to past releases that led to soil and groundwater contamination. However, the Project site itself has not been identified on regulatory databases nor have soil and groundwater investigations been mandated by regulatory agencies. The Project site, which consists mostly of a paved parking lot, has been in its current configuration for at least 23 years.

Groundwater beneath the Corteva property occurs in two water-bearing zones: the upper-sand interval [approximately 40 to 85 feet below ground surface (bgs)] and lower-sand interval (approximately 110 to 135 feet bgs)[1]. The State Water Resources Control Board's (SWRCB) Geotracker database contains information on the investigation and remediation activities at the Corteva property. [2] These files indicate that certain sites to the north and in a downgradient groundwater flow direction from the Project site experienced past releases of volatile organic compounds (VOCs) that reached the underlying soil and groundwater. Modeled contaminant plumes appear to have at one time primarily occupied the areas in the northern half of the Corteva property.[3] As discussed in the Draft IS/MND (page 52), VOC contamination was identified in the upper and lower groundwater aquifers. In response to the

[1] Former Dow Chemical Company Facility, Pittsburg, California 2020 Annual Self-Monitoring Report Self-Monitoring Program Site Cleanup Requirements Order No. R2-2019-0029 Final February 2021. Prepared by Jacobs Engineering Group for The Dow Chemical Company.

[2] SWRCB Geotracker Database. 2025. Result for Dow Chemical Pittsburg Facility, (SL20210828). https://geotracker.waterboards.ca.gov/profile_report?global_id=SL20210828&mytab=esidata#esidata. Accessed March 2025.

[3] Former Dow Chemical Company Facility, Pittsburg, California 2020 Annual Self-Monitoring Report Self-Monitoring Program Site Cleanup Requirements Order No. R2-2019-0029 Final February 2021. Prepared by Jacobs Engineering Group for The Dow Chemical Company.

groundwater contamination and subsequent regulatory requirements, Corteva has been operating an on-site Enhanced In-Situ Bioremediation (EISB) system for groundwater remediation since March 2020.

In his comments on the Draft IS/MND, Dr. James Clark of Clark and Associates cited information from the SWRCB Geotracker database for groundwater monitoring wells 408B1, located approximately 360 feet northwest of the Project site, and 424B and C, located 800 feet to the northeast. In his comments, Mr. Clark stated that, "*wells closest to the Project site (408B1 and 424C) indicate the presence of multiple hazardous contaminants, including carcinogens such as cis-1,2-dichloroethene, trichloroethene (TCE), tetrachloroethylene (PCE), methylene chloride, carbon tetrachloride, chloroform, vinyl chloride, and benzene"*. He then attempted to illustrate this by reporting that, "*the **current*** [emphasis added] *concentration of PCE in the shallow wells nearest the Project site were measured at 4,200 ug/L in Well 408B1, 120 ug/L at Well 424C, and 130 ug/L at Well 424B and the concentrations of TCE in Wells 408B1, 424C, and 424B were measured at 66 ug/l, 482 ug/L, and 14 ug/L, respectively."* These concentrations do not represent current data and are inconsistent with those reported in the Geotracker database from April 2024, the most current data available.[4] Geotracker reported concentrations of PCE in monitoring well 424C and 424B at 0.2 µg/L and TCE in monitoring well 424C at 0.31 µg/L and 1.0 µg/L in monitoring well 424B. These concentrations are far lower than the so called "current" data erroneously reported by Dr. Clark and considerably lower than the Environmental Screening Levels for groundwater set forth by the SWRCB for PCE (3.0 µg/L) and TCE (5.0 µg/L). Furthermore, as reported by Dr. Clark, PCE was detected in monitoring well 408B1 at 4,200 µg/L and TCE was detected at 66 µg/L, however, those data are not current; they were reported in April 2019, almost 6 years ago—before groundwater remediation began—and the last time well 408B1 was sampled. The groundwater quality data collected in April 2024 show that since the EISB system went online in 2020, it has been effective in decreasing concentrations of VOCs in the upper and lower sand intervals beneath the Corteva site.[5] These data contradict Dr. Clark's assertion that there are multiple hazardous contaminants in close proximity to the Project site.

The 2020 Self-Monitoring Program Report provides groundwater contamination plume maps that project the size and location of plumes associated with carbon tetrachloride, chloroform, PCE, TCE, cis1,2 DCE, and vinyl chloride. These projections are based on groundwater data collected in spring 2020 from select monitoring wells. Only the projected extent of the carbon tetrachloride plume is shown to intersect the Project site at a maximum concentration of 1,000 µg/L in the upper sand interval and 100 µg/L in the lower interval. Additionally, apart from the modeled upper sand interval PCE plume approaching the northern Project site boundary, the projected plumes associated with PCE and TCE did not extend beneath the Project site. The contaminant plume maps generated for the 2024 Self-Monitoring Program Report indicate that the contaminant plumes, particularly for carbon tetrachloride, have reduced in size, suggesting that the EISB has been effective in remediating groundwater contaminants.[6] The existing contaminate plumes on the Corteva property remain in a downgradient groundwater flow direction (i.e., the Project site is upgradient from the contaminant source). Groundwater quality data illustrated in the 2020 and 2024 Self-Monitoring Program Reports nullify Dr. Clark's presumption that the elevated PCE and TCE concentrations detected in nearby monitoring well 408B1 represent concentrations beneath the Project site.

Dr. Clark's claim that onsite workers might face harmful indoor air contamination from vapor intrusion during Project operations is unfounded. First, as described above, Dr. Clark presents no credible

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[4] SWRCB Geotracker Database. 2025. Result for Dow Chemical Pittsburg Facility, (SL20210828). https://geotracker.waterboards.ca.gov/profile_report?global_id=SL20210828&mytab=esidata#esidata. Accessed March 2025.

[5] Former Dow Chemical Company Facility, Pittsburg, California 2020 Annual Self-Monitoring Report Self-Monitoring Program Site Cleanup Requirements Order No. R2-2019-0029 Final February 2021. Prepared by Jacobs Engineering Group for The Dow Chemical Company.

[6] Former Dow Chemical Company Facility, Pittsburg, California January – December 2024 Annual SCR Report, Self-Monitoring Program, Site Cleanup Requirements Order No. R2-2019-0029 Final February 2025. Prepared by Jacobs Engineering Group for The Dow Chemical Company.

evidence that the VOCs detected in the offsite groundwater wells are comparable to the groundwater conditions beneath the Project site. Second, the proposed Project would feature a solid concrete floor and would lack a fixed roof, minimizing the risk of vapor entrapment in an enclosed space.

There is no substantial evidence that soil slated for excavation during Project construction is contaminated from past hazardous materials use. However, as discussed in the Draft IS/MND (page 54), a Soil Management Plan (SMP) would be developed and implemented for the construction phase of the Project to reduce potential health risks from unanticipated soils contamination, especially to construction workers. The SMP is discussed in further detail in Comment Response A-9.

In summary, there is no substantial evidence to support a fair argument that the proposed Project would result in potentially significant hazard impacts. There is no evidence that historical or current site operations have contaminated soil or groundwater. While the larger Corteva industrial complex has reported soil and groundwater contamination, its extent appears not to have substantially impacted the Project site. The Corteva property has been under active remediation for almost 6 years and current groundwater data indicates the remediation is effective and groundwater concentrations of VOCs are decreasing. As an additional measure to safeguard construction workers during site grading, the SMP, proposed as part of the Project, would be implemented to monitor soil and identify unanticipated contamination

Response to Comment A-8

The Project would use various chemical compounds in its operation, as described in the Draft IS-MND (pages 5 and 55) and of these compounds, three are on California's regulated substances list for accidental release prevention.[7] Sulfuric acid, hydrogen chloride, and chlorine (gas) would be stored and consumed on the Project site (considered a "stationary source" [8] by CalARP) in quantities that could exceed the State thresholds. As described in the Draft IS-MND (page 56), chlorine and hydrogen chloride used in the processes would be transported onto the Project site via existing Corteva owned and operated pipelines and would be connected to the Pencco operations through a 40-foot extension pipeline. Sulfuric acid would be transported by tanker truck and stored onsite.

As described in the Draft IS/MND (page 54) the Consolidated Unified Program Agency (CUPA) is the Contra Costa Health Services Hazardous Materials Programs (CCHSHMP) for the City of Pittsburg. In accordance with the California Health and Safety Code, Chapter 6.95, Article 2, Sections 25531-25543.3 and Title 19 of the California Code of Regulations (CCR), Division 2, Chapter 4.5. – "CalARP Program Regulations", the CUPA would require Pencco to complete a Risk Management Plan (RMP) for its facility independent of the RMP that currently exists for the Corteva site. The RMP would include a process hazard analysis (PHA) (CCR Title 19 §5100.2) and an offsite consequences analysis (OCA) (CCR Title 19 § 5070.2). The PHA shall identify, evaluate, and control the hazards involved in chemical processing while the OCA, as noted in the Draft IS/MND (page 54), would assist in determining the facility's program level,[9] specify required protocols for chemical hazard analysis, and develop various management plans for routine and non-routine situations involving the subject chemicals. As mentioned by Dr. Clark in his comment, consistent with the CalARP guidance on evaluating a worst-case release scenario, modeling would be required to assess the potential impact from an accidental release of chlorine from the Corteva pipeline extension on the Project site and at the storage vessels, if deemed

[7] Title 19. Public Safety, Division 5. California Environmental Protection Agency, Chapter 2. California Accidental Release Prevention (CalARP) Program Detailed Analysis, Article 9. Regulated Substances for Accidental Release Prevention 19 CCR § 5130.6 Table 3.

[8] Stationary source is defined as "any buildings, structures, equipment, installations, or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur.

[9] In the (CalARP) program, "program levels" refer to categories that determine the level of detail and requirements for a facility's Risk Management Plan (RMP), based on the potential for accidental releases and their impact.

necessary. The chemical release estimate would be based on the maximum quantity of chlorine gas in the process that could be released during a catastrophic pipeline or storage vessel rupture.

In summary, as required by law, Pencco would prepare an RMP to develop protocols to reduce the potential for the release of hazardous materials and response actions that would protect workers and the public if a release were to occur. The CUPA would ensure that Pencco complete the RMP process prior to issuing its permit to operate. The Draft IS/MND does not defer the analysis of significant hazardous materials; rather, it presents the types and quantities of the chemical compounds and accurately describes the regulatory structure that is required by the State of California and the CUPA to ensure that the proposed facility operates in compliance with regulations that reduce the potential for significant adverse impacts associated with transport, storage and use of hazardous chemicals.

Response to Comment A-9

See Comment Response A-7. The Draft IS/MND analysis concluded that impacts associated with soil and groundwater contamination hazards were less than significant because no evidence was found to suggest that the Project site is currently, or has in the past, supported operations that would contribute to contamination of the soil and groundwater. State databases (Geotracker and Envirostor) do not report soil or groundwater contamination at the Project site, nor any previous investigation or remediation activity. Furthermore, the Project site is entirely paved and has remained in the same configuration for at least 23 years. Groundwater contamination has been identified north of the Project site and the contaminant plumes are in a downgradient groundwater flow direction. Plume maps modeled in 2020 and 2024 indicated that low levels of carbon tetrachloride plume may have extended beneath the property in the lower and upper water bearing sand intervals. However, these plumes have receded as groundwater remediation has been ongoing since 2020. Because there was no substantial evidence of a significant impact, no mitigation measures were deemed necessary.

The Soil Management Plan (SMP), which would be developed and implemented for the construction phase of the Project is a standard best practice for construction in industrial settings and considered a safeguard to protect workers if unanticipated soil contamination is encountered during demolition and grading. The SMP outlines the procedures contractors are to follow if soils contaminated with hydrocarbons, VOCs, or pesticides are encountered during disturbance and removal of onsite soils. The SMP would be prepared and submitted to the City prior to issuance of building permits based on the current understanding of the Project site uses, history, and proposed construction activity. Procedures set forth in the SMP are standard industry accepted protocols, which could include active air monitoring for volatile organic compounds, soil sampling, soils segregation, and pre-disposal chemical screening. The final disposition of impacted soil depends on the preliminary screening effort and follow-up laboratory testing as required by the waste-accepting facility. Soil sampling and laboratory analysis for profiling of waste would be performed in coordination with appropriate disposal sites to maximize efficiency in removing material off-site. Handling and disposal of impacted soil would be conducted in accordance with all applicable state and federal laws. These procedures and protocols effectively reduce the risk of worker exposure to hazardous materials and for long term worker exposure during operations. While presented as a Project design feature, the City of Pittsburg would consider the SMP a Condition of Project Approval, requiring its preparation and submittal to the City prior to issuance of building permits.

Response to Comment A-10

See Responses A-11, A-12, A-13, and A-14.

Response to Comment A-11

A health impact assessment (HRA) was completed for the Project to evaluate the health impacts on nearby sensitive receptors. The HRA focused on health impacts on existing residences, offsite workers,

and educational facilities from emissions of toxic air contaminants (TAC)[10] such as diesel particulate matter (DPM)[11] from diesel equipment and haul truck emissions associated with the Project construction activities and operational air toxics emissions from haul trucks, the cooling tower, and the scrubber. The HRA was conducted to determine the health impacts, in terms of excess cancer risk and non-cancer hazards, using the significance levels identified by the Bay Area Air Quality Management District (BAAQMD)'s *CEQA Air Quality Guidelines*.[12] In accordance with the BAAQMD *CEQA Air Quality Guidelines*, the HRA also evaluated concentrations of particulate matter equal to or less than 2.5 micrometers (fine particulate or $PM_{2.5}$ as combustion exhaust and fugitive dust). The HRA was prepared based on the California Office of Environmental Health Hazard Assessment (OEHHA)'s *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments.*[13]

AERMOD (Version 23132)[14] was used for the dispersion analysis within the HRA. Since the completion of the HRA, AERMOD (Version 24142) has been released.

There are two meteorological stations located near the Project site. Concord Buchanan Field is located approximately 11.6 miles southwest of the Project site. The Dow meteorological station is located approximately 0.5 miles southeast of the Project site.[15]

For Concord Buchanan Field, meteorological data from 2013 through 2017 were used. **Figure RTC-1** displays the annual wind rose. Wind directions are predominantly from the south with a moderate frequency of calm wind speed conditions (6 percent), as shown in **Figure RTC-2**. The average annual wind speed is 7.8 miles per hour (3.5 meters per second).

The Dow meteorological station also has data from 2013 through 2017. **Figure RTC-3** displays the annual wind rose. Wind directions are predominantly from the west with a low frequency of calm wind speed conditions (1.5 percent), as shown in **Figure RTC-4**. The average annual wind speed is 8.1 miles per hour (3.6 meters per second).

During the completion of the HRA and at publication of the Draft IS/MND, the Dow meteorological data available from BAAQMD was missing information from June 15 through December 31 of 2016.[16] The Dow meteorological data did not meet the USEPA requirement of 90 percent data capture,[17] [18] and was not acceptable to use in the dispersion modeling analysis (regardless of whether the monitoring station

[10] Toxic air contaminants are a broad class of compounds known to cause morbidity or mortality. TAC are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., gasoline service stations, dry cleaners). TAC are typically found in low concentrations, even near their source (e.g., diesel particulate matter near a freeway). Because chronic exposure can result in adverse health effects, TAC are regulated at the regional, state, and federal level.

[11] In 1998, the California Air Resources Board classified diesel particulate matter as a toxic air contaminant, citing its potential to cause cancer and other health problems. The US Environmental Protection Agency concluded that long-term exposure to diesel engine exhaust is likely to pose a lung cancer hazard to humans and can also contribute to other acute and chronic health effects.

[12] Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, April 20, 2023, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

[13] Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, February 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

[14] US Environmental Protection Agency, AERMOD Modeling System, https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models

[15] Bay Area Air Quality Management District, AERMOD-ready Meteorological Data, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/ceqa-modeling-data

[16] Bay Area Air Quality Management District, AERMOD-ready Meteorological Data, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/ceqa-modeling-data

[17] US Environmental Protection Agency, *Guideline on Air Quality Models (Revised), 40 Code of Federal Regulations, Part 51, Appendix W,* November 2005

[18] US Environmental Protection Agency, Meteorological Monitoring Guidance for Regulatory Modeling Applications, February 2000, https://www.epa.gov/sites/default/files/2020-10/documents/mmgrma_0.pdf

was more representative of the Project site) and thus was not used for the HRA prepared for the Draft IS/MND.

However, in February of 2025, the BAAQMD updated the Dow meteorological data to address the missing information and thus, this updated HRA (**Attachment A**) used the Dow meteorological data and provided a comparison with the HRA results using the Concord Buchanan Field meteorological data. With the updated HRA, the Project would continue to have a less than significant health impact with mitigation.

Attachment A provides updated HRA documentation of the methodology, assumptions, and detailed results using the Concord Buchanan Field and Dow meteorological data as well as the current AERMOD version.

Figure RTC-1
Windrose for Concord Buchanan Field

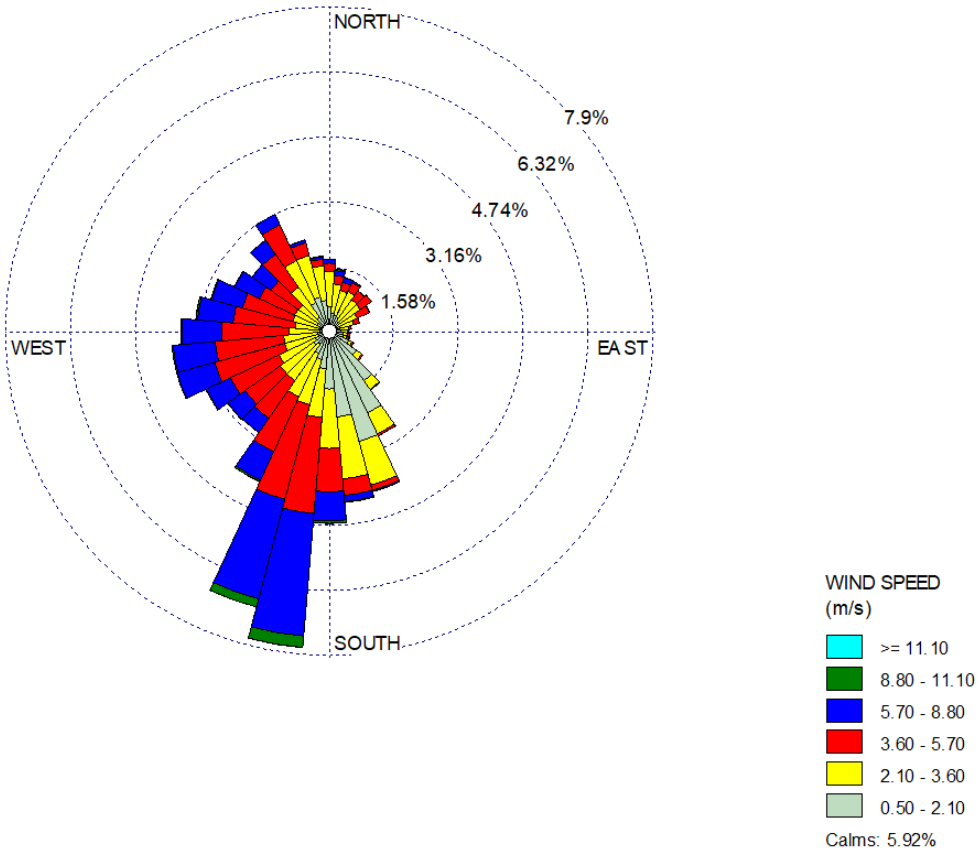


Figure RTC-2
Windrose for Dow

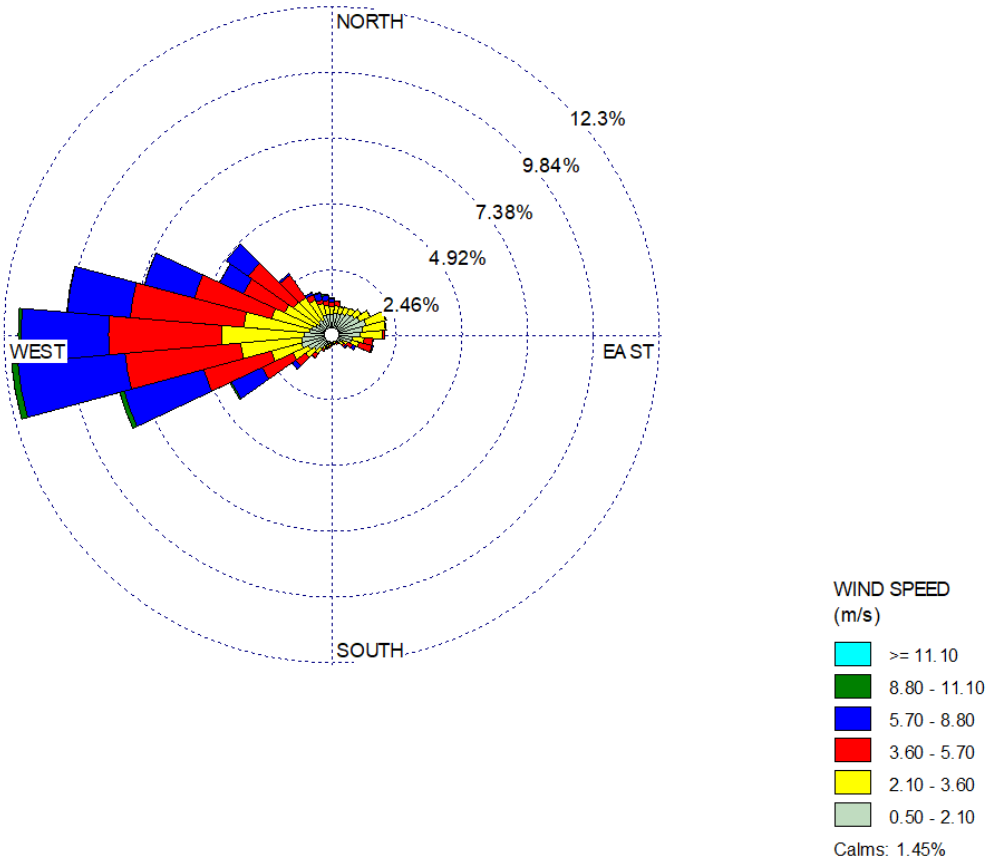


Figure RTC-3
Wind Speed Distribution for Concord Buchanan Field

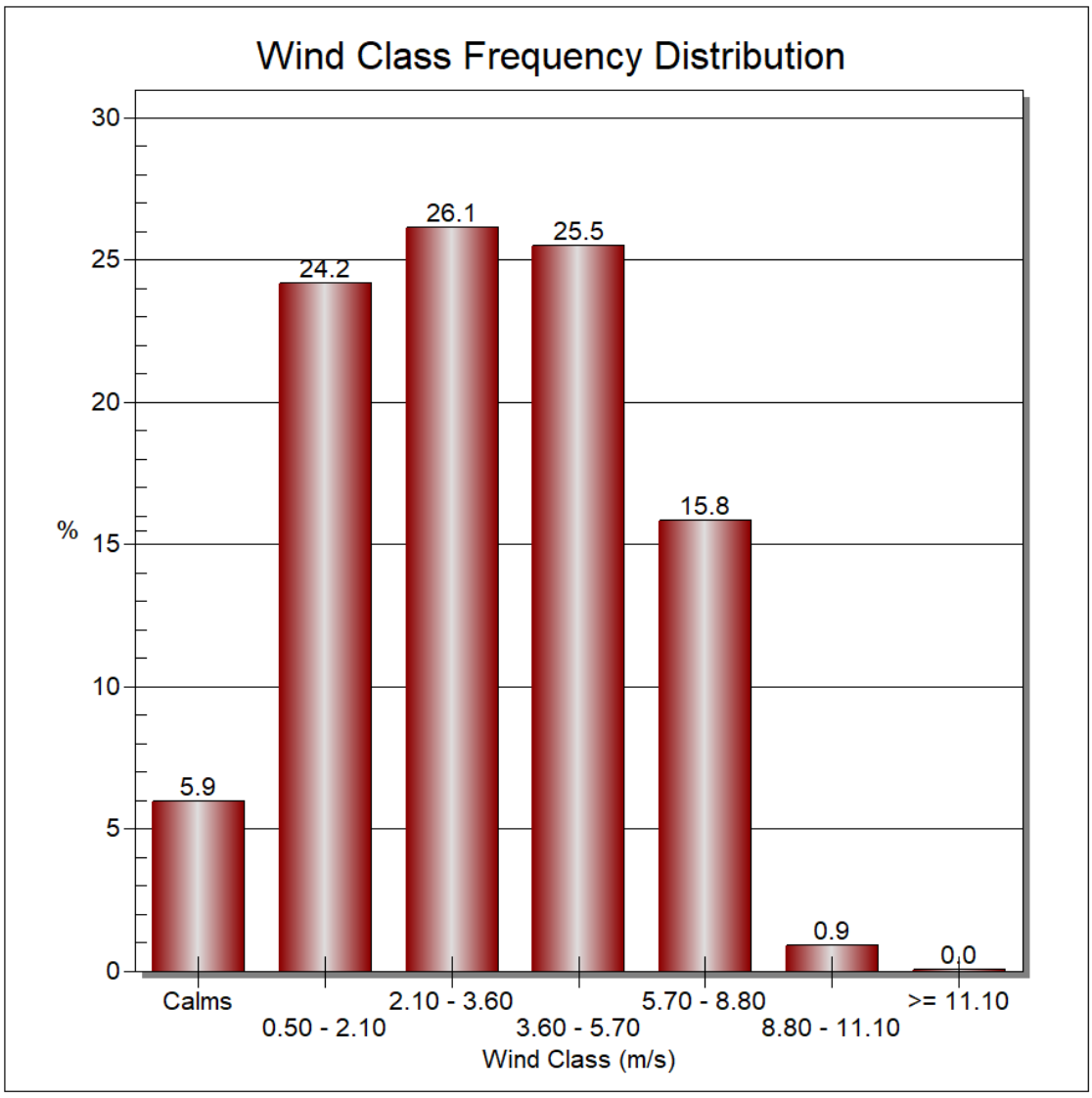


Figure RTC-4
Wind Speed Distribution for Dow

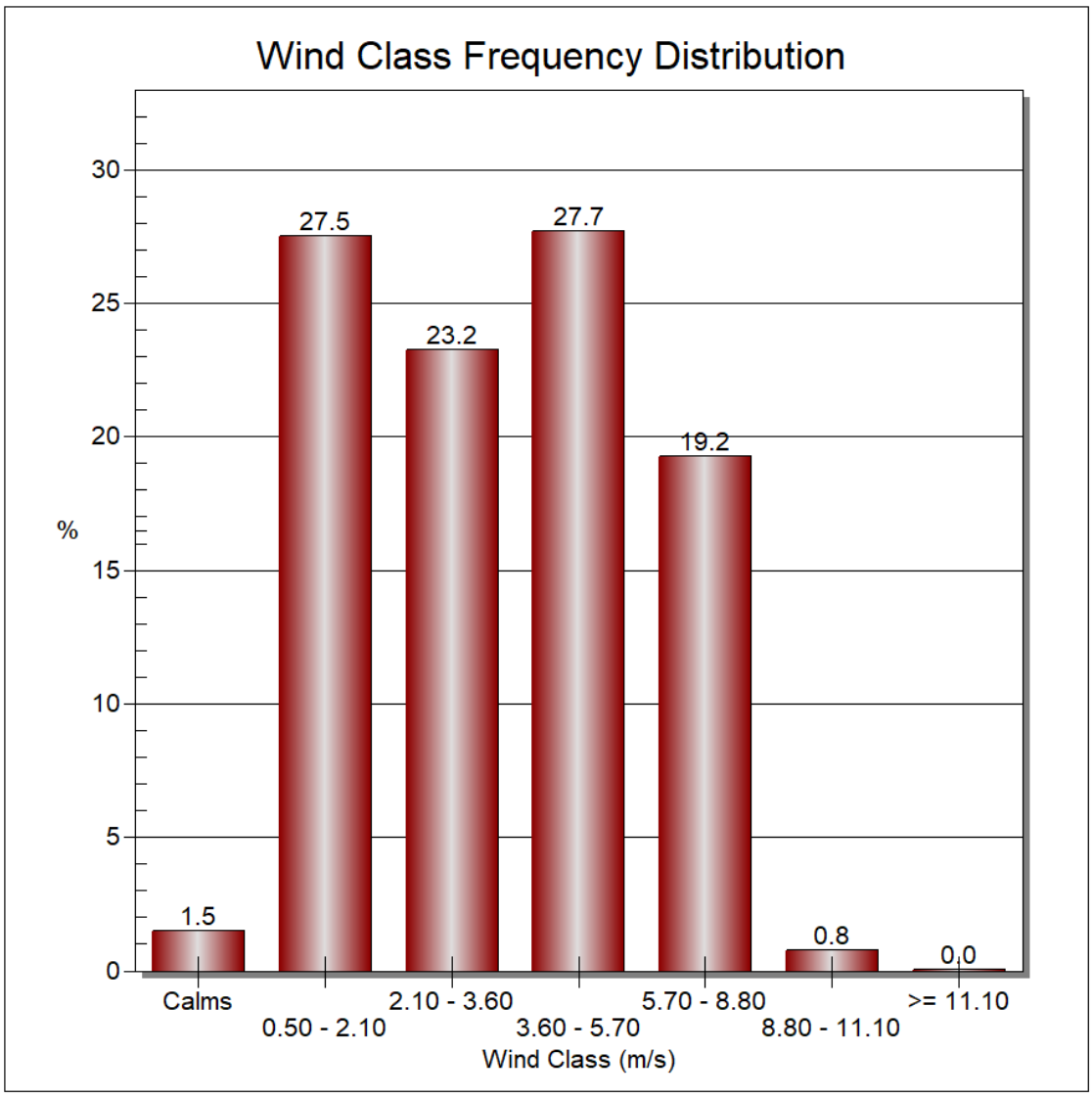


Table RTC-1 displays the estimated health impacts from Project construction using meteorological data from Concord Buchanan Airport and AERMOD (Version 24142). The maximum cancer risk from Project construction emissions would be below the BAAQMD threshold of 10 per million and would be less than significant. The chronic HI would be below the project-level threshold of 1. The Project's unmitigated annual $PM_{2.5}$ concentration from construction activities would be 0.82 µg/m^3 at offsite workers. Thus, the annual $PM_{2.5}$ concentration due to Project construction (combustion exhaust and fugitive dust) would be potentially significant and above the BAAQMD threshold of 0.3 µg/m^3. With **Mitigation Measure AQ-1 and AQ-2,** the Project's annual $PM_{2.5}$ concentration from construction activities would be 0.23 µg/m^3 at offsite workers. Thus, the annual $PM_{2.5}$ concentration due to Project construction (combustion exhaust and fugitive dust) would be less than significant and less than the BAAQMD threshold of 0.3 µg/m^3 with mitigation incorporated.

There were minimal changes in the HRA results using the Concord Buchanan Airport and updated AERMOD (Version 24142) when compared to the HRA results within the published Draft IS/MND (as shown in underline and ~~strikeout~~).

Table RTC-1

Estimated Project Construction Health Impacts Summary – Concord Buchanan Airport

Condition	Receptor type	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Project Construction	Residence	0.18 ~~0.13~~	<0.01	<0.01
Unmitigated Project Construction	School	0.01	<0.01	<0.01
Unmitigated Project Construction	Offsite Worker	1.85 ~~1.83~~	0.09	**0.82** ~~**0.89**~~
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	**Yes**
Mitigated Project Construction	Residence	0.05	<0.01	<0.01
Mitigated Project Construction	School ~~Residence~~	<0.01	<0.01	<0.01
Mitigated Project Construction	Offsite Worker	0.26 ~~0.24~~	0.01	0.23 ~~0.21~~
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	No

Table RTC-2 displays the estimated health impacts from Project construction using meteorological data from Dow and AERMOD (Version 24142). The maximum cancer risk from Project construction emissions would be below the BAAQMD threshold of 10 per million and would be less than significant. The chronic HI would be below the project-level threshold of 1. The Project's unmitigated annual $PM_{2.5}$ concentration from construction activities would be 0.89 µg/m^3 at offsite workers. Thus, the annual $PM_{2.5}$ concentration due to Project construction (combustion exhaust and fugitive dust) would be potentially significant and above the BAAQMD threshold of 0.3 µg/m^3. With **Mitigation Measure AQ-1 and AQ-2,** the Project's annual $PM_{2.5}$ concentration from construction activities would be 0.27 µg/m^3 at offsite workers. Thus, the annual $PM_{2.5}$ concentration due to Project construction (combustion exhaust and fugitive dust) would be less than significant and less than the BAAQMD threshold of 0.3 µg/m^3 with mitigation incorporated.

The conclusions show the estimated health impacts from Project construction are the same using meteorological data from Concord Buchanan Airport and Dow; the proposed Project construction would result in less than significant health impacts with mitigation and the conclusions in the Draft IS/MND would not change.

Table RTC-2

Estimated Project Construction Health Impacts Summary – Dow

Condition	Receptor type	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Project Construction	Residence	1.08	<0.01	0.01
Unmitigated Project Construction	School	0.07	<0.01	0.01
Unmitigated Project Construction	Offsite Worker	2.01	0.09	**0.89**
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	**Yes**
Mitigated Project Construction	Residence	0.19	<0.01	<0.01
Mitigated Project Construction	School	0.02	<0.01	<0.01
Mitigated Project Construction	Offsite Worker	0.28	0.01	0.27
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	No

Table RTC-3 displays the estimated health impacts from Project operation using meteorological data from Concord Buchanan Airport and AERMOD (Version 24142). There were minimal changes in the HRA results using the Concord Buchanan Airport and updated AERMOD (Version 24142) when compared to the HRA results within the published Draft IS/MND (as shown in underline and ~~strikeout~~).

Table RTC-3

Estimated Project Operation Health Impacts Summary - Concord Buchanan Airport

Condition	Receptor type	Cancer Risk	Hazard Impact (acute/chronic)	$PM_{2.5}$ Concentration
Project Operation (Uncontrolled)	Residence	~~<0.01~~ 0.03	0.12/<0.01	<0.01
Project Operation (Uncontrolled)	School	~~<~~0.01	0.08/<0.01	<0.01
Project Operation (Uncontrolled)	Offsite Worker	0.64	**12.5**/0.05	0.04
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	**Yes**	No ~~Yes~~
Project Operation (Stage 1)	Residence	<0.01	<0.01/<0.01	<0.01
Project Operation (Stage 1)	School ~~Residence~~	<0.01	<0.01/<0.01	<0.01
Project Operation (Stage 1)	Offsite Worker	0.64	0.37/<0.01	0.04
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	No
Project Operation (Stage 2)	Residence	<0.01	<0.01/<0.01	<0.01
Project Operation (Stage 2)	School	<0.01	<0.01/<0.01	<0.01
Project Operation (Stage 2)	Offsite Worker ~~Residence~~	0.64	<0.01/<0.01	0.04
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	No

The maximum cancer risk from Project operation emissions would be below the BAAQMD threshold of 10 per million and would be less than significant. The uncontrolled chronic HI would be above the project-level threshold of 1. However, with stage 1 and 2 for the scrubber, the chronic HI would be below the project-level threshold of 1 and the impact of the Project operation would be less than significant. The annual $PM_{2.5}$ concentration from Project operation would be less than 0.3 µg/m^3 and less than significant.

Table RTC-4 displays the estimated health impacts from Project operation using meteorological data from Dow and AERMOD (Version 24142). The maximum cancer risk from Project operation emissions would be below the BAAQMD threshold of 10 per million and would be less than significant. The uncontrolled chronic HI would be above the project-level threshold of 1. However, with stage 1 and 2 for the scrubber, the chronic HI would be below the project-level threshold of 1 and the impact of the Project operation would be less than significant. The annual $PM_{2.5}$ concentration from Project operation would be less than 0.3 µg/m^3 and less than significant.

The conclusions associated with the estimated health impacts from Project operation are the same using meteorological data from Concord Buchanan Airport and Dow; the proposed Project operations would result in less than significant health impacts and the conclusions in the Draft IS/MND would not change.

Table RTC-4
Estimated Project Operation Health Impacts Summary – Dow

Condition	Receptor type	Cancer Risk	Hazard Impact (acute/chronic)	$PM_{2.5}$ Concentration
Project Operation (Uncontrolled)	Residence	0.06/0.02	0.30/<0.01	<0.01
Project Operation (Uncontrolled)	School	0.03	0.18/0.01	<0.01
Project Operation (Uncontrolled)	Offsite Worker	0.80	**17.1**/0.06	0.05
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	**Yes**	No
Project Operation (Stage 1)	Residence	0.06/0.02	0.01/<0.01	<0.01
Project Operation (Stage 1)	School	0.03	0.01/<0.01	<0.01
Project Operation (Stage 1)	Offsite Worker	0.80	0.51/<0.01	0.05
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	No
Project Operation (Stage 2)	Residence	0.06/0.02	<0.01/<0.01	<0.01
Project Operation (Stage 2)	School	0.03	<0.01/<0.01	<0.01
Project Operation (Stage 2)	Offsite Worker	0.80	<0.01/<0.01	0.05
BAAQMD Significance Threshold		10.0	1.0	0.3
Potentially Significant?		No	No	No

As shown in **Table RTC-1** through **RTC-4**, the conclusions associated with the estimated health impacts from Project construction and operation are the same using meteorological data from Concord Buchanan Airport and Dow; the proposed Project construction and operations would result in less than significant health impacts. An Errata has been prepared to revise the Draft IS/MND with the results of the Updated HRA using Dow data because it has slightly greater risk levels than Concord Buchanan Airport.

Response to Comment A-12

The HRA was conducted following methodologies in OEHHA's *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*.[19] This was accomplished by applying the estimated concentrations at the receptors analyzed to the established cancer risk estimates and acceptable reference concentrations for non-cancer health effects.

OEHHA has developed exposure factors (e.g., daily breathing rates) for six age groups including the last trimester to birth, birth to 2 years, 2 to 9 years, 2 to 16 years, 16 to 30 years, and 16 to 70 years. These age bins allow for more refined exposure information to be used when estimating exposure and the potential for developing cancer over a lifetime. This means that exposure variates are needed for the third trimester, ages zero to less than two, ages two to less than nine, ages two to less than 16, ages 16 to less than 30, and ages 16 to 70. Residential receptors utilize the 95th percentile breathing rate values. The breathing rates are age-specific and are 361 liters per kilogram-day for third trimester of pregnancy, 1,090 liters per kilogram-day for ages less than 2 years, 745 liters per kilogram-day for ages 2 to 16 years, 335 liters per kilogram-day for ages 16 to 30 years, and 290 liters per kilogram-day for ages 30 to 70 years. A school child's breathing rate is 520 liters per kilogram-day and an off-site worker's breathing rate is 230 liters per kilogram-day.[20]

OEHHA developed age sensitivity factors (ASF) to take into account the increased sensitivity to carcinogens during early-in-life exposures. OEHHA recommends that cancer risks be weighted by a factor of 10 for exposures that occur from the third trimester of pregnancy to 2 years of age, and by a factor of 3 for exposures from 2 years through 15 years of age.

Based on OEHHA recommendations, the cancer risk to residential receptors assumes exposure occurs 24 hours per day for 350 days per year while accounting for a percentage of time at home. OEHHA evaluated information from activity pattern databases to estimate the fraction of time at home (FAH) during the day. This information was used to adjust exposure duration and cancer risk based on the assumption that a person is not present at home continuously for 24 hours and therefore exposure to emissions is not occurring when a person is away from their home. In general, the FAH factors are age-specific and are 0.85 for ages less than 2 years, 0.72 for ages 2 to 16 years, and 0.73 for ages 30 to 70 years.

Table RTC-5 presents a summary of the updated HRA exposure factors with the addition of the third trimester of pregnancy period. Notably, the issue with a third trimester exposure only applies to a residential receptor. The nearest residential land uses (in the area bordered by the Pittsburg-Antioch Highway, Central Addition Park, Manor Street, and the railroad tracks) are located approximately one mile southwest of the Project site. The Project construction occurs over a 14-month period so as determined (third trimester into year two) the results are conservative (overestimation). The resultant updated health impacts at the residential receptors (as shown in **Tables RTC-1** through **RTC-4**) are well below the significance threshold (1.6 percent of the thresholds). The maximum cancer risk from mitigated Project construction emissions for an existing residence would be 0.05 and 0.19 per million, respectively, using the Concord Buchanan Airport and Dow monitoring stations. These values are well below the BAAQMD threshold of 10 per million and would be less than significant.

[19] Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

[20] Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

Table RTC-5
Health Risk Assessment Exposure Factors

Receptor	Age	Age Specific Factor	Breathing Rate (L/kg-day)	Fraction of Time	Daily Exposure	Annual Exposure
Offsite Worker	16 to 41	1	230	1	8 hours	250 days
Residential	Third Trimester	10	361	0.85	24 hours	350 days
	0 to 2	10	1,090	0.85	24 hours	350 days
	2 to 16	3	745	0.72	24 hours	350 days
	16 to 30	1	261	0.73	24 hours	350 days
School Child	2 to 16	3	581	1	10 hours	180 days

Source: Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

Response to Comment A-13

For occupational receptors, OEHHA guidance states that the exposure is based on eight hours per day, five days per week, 50 weeks per year, 250 working days per year, and a 25-year working lifetime. This is a conservative assumption since most people do not remain at the same job for 25 years. For offsite worker exposures, it is assumed that the working age begins at 16 years, and that exposures to project emissions occur during the work shift which is typically up to eight hours per day during workdays.[21] Therefore, a value of 250 working days per year was used in the HRA.

Response to Comment A-14

Based on information from San Francisco Planning Department[22]and the California Air Resources Board[23], **Table RTC-6** was developed showing the availability of construction equipment by regulatory tier requirement within the Bay Area during 2014, 2017, 2020, 2023. **Table RTC-6** also shows the projected availability in 2026 (based on the trend from 2020 to 2023). As shown, by 2026, it is expected that 75 percent of construction equipment (a total of 23,594 pieces of equipment) within the Bay Area would be Tier 4 or electric. This corresponds to a strong availability of Tier 4 Final (or electric) equipment in the Bay Area especially given the number of pieces of equipment needed for the Project (approximately 14 units), the small Project size (1.38 acres), and the short duration of the project construction (approximately 14 months). CARB data for 2020 shows that approximately 42.2 percent of the construction equipment within California are Tier 4 Final; this equates to 60,771 pieces of construction equipment.[24] Therefore, there would be no issues with the availability of Tier 4 Final and electric construction equipment for the proposed Project or the enforceability of **Mitigation Measure AQ-2**.

[21] Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

[22] San Francisco Planning Department, *Off-Road Construction Equipment Vehicle Inventory*, October, 2023, https://sfplanning.org/air-quality

[23] California Air Resources Board, *2022 CARB Construction, Industrial, Mining and Oil Drilling Emissions Inventory*, August 2022, https://ww2.arb.ca.gov/sites/default/files/2023-04/2022InUseDieselInventory.pdf

[24] California Air Resources Board, *2022 CARB Construction, Industrial, Mining and Oil Drilling Emissions Inventory*, August 2022, https://ww2.arb.ca.gov/sites/default/files/2023-04/2022InUseDieselInventory.pdf

Table RTC-6

Construction Equipment Inventory by Regulatory Tier Requirement

Tier	2010	2014	2017	2020	2023	2026
0	26.68%	22.91%	18.33%	12.26%	7.56%	3.18%
1	26.15%	23.48%	19.28%	13.76%	8.36%	3.33%
2	29.58%	25.38%	22.18%	17.48%	11.43%	5.81%
3	15.80%	11.33%	10.46%	9.45%	6.36%	3.49%
4 Interim	1.79%	12.83%	13.92%	14.41%	11.14%	8.10%
4 Final	0.00%	4.07%	15.83%	32.65%	43.69%	53.97%
Electric	0.00%	0.00%	0.00%	0.00%	11.46%	22.13%
Number of Equipment	21,378	22,854	27,429	28,848	29,926	31,004

Source: San Francisco Planning Department, *Off-Road Construction Equipment Vehicle Inventory*, October, 2023, https://sfplanning.org/air-quality

Response to Comment A-15

As discussed in the Draft IS/MND (page 37), the Project site is underlain by Quaternary sediments mapped as Pleistocene-age alluvial deposits.[25] These sediments contain mostly clay and silt but also include mixtures of sand and gravel in varying degrees of consolidation. This characterization is supported by the description of site lithology presented in the Regional Water Quality Control Board Order (R2-2002-0014) (the Order) that pertains to the Corteva property.[26] The Order describes materials underlying the Corteva property as a low permeability silty clay in the upper 40 feet.

As discussed in the Draft IS/MND (page 40) liquefaction occurs when saturated sandy or gravelly materials become liquified due to ground shaking during an earthquake. The available published maps and geologic information provide reasonable evidence that the materials beneath the Project site are not susceptible to liquefaction. The Draft IS/MND also states that the Project site lies within a region designated by California's Seismic Hazard Mapping Act (SHMA) as susceptible to liquefaction and is considered an area of moderate to low liquefaction potential. SHMA zoning identifies areas, based on regional geologic conditions, where there is a potential for liquefaction to occur and where soil testing is required to confirm the presence or absence of problematic soils on a particular parcel. However, zoning under the SHMA does not necessarily mean that liquefiable materials are confirmed at a particular site. Properties that lie within a SHMA designated liquefaction zone must perform a geologic investigation pursuant to the California Geological Survey's (CGS) Special Publication (SP) 117A *Guidelines for Evaluating and Mitigating Seismic Hazards in California*[27] to evaluate the individual site for liquefaction susceptibility and apply geotechnical recommendations necessary to reduce the severity of liquefaction

[25] USGS, 1979. Helley E.J. and K.R. Lajoie. Flatland Deposits of the San Francisco Bay Region, California—their geology and engineering properties and their importance to comprehensive planning. U.S. Geological Survey Professional Paper 943.

[26] California Regional Water Quality Control Board, San Francisco Bay Region Order No. R2-2002-0014, Site Clean up requirements for Dow Chemical Company for the property located at: 901 Loveridge Road, Pittsburg, Contra Costa County.

[27] California Geological Survey, 2008. *Guidelines for Evaluating and Mitigating Seismic Hazards in California*. Special Publication 117.

hazards. As discussed in detail on page 40 of the Draft IS/MND, the design-level geotechnical investigation that the applicant would be required by the City of Pittsburg to conduct prior to final facility design would include subsurface exploration and soil testing in accordance with the guidelines set forth in SP 117A. The geotechnical study is meant to determine the subsurface conditions, not only to identify problematic soil conditions, but also to assist in final foundation structural design. If liquefiable soils are discovered and determined to be a hinderance to adequate foundation support, the geotechnical engineer would recommend measures to eliminate the liquefaction hazard. As discussed in the Draft IS/MND (page 40), remedies include ground improvement techniques (e.g., dynamic compaction jet grouting, lime stabilization) or placement of foundation piers that extend into competent materials below liquefiable material. Geotechnical methods to reduce hazards from liquefaction are standard, industry-accepted solutions used throughout the San Francisco Bay Area to remedy liquefiable soil conditions and reduce the liquefaction hazards. Additionally, the City of Pittsburg requires projects to implement the recommendations and geotechnical remedies outlined in the required design-level geotechnical investigation. Contrary to the commentor's assertion, the Draft IS/MND is not deferring analysis of liquefaction hazards; for the purposes of Draft IS/MND, there is evidence to reasonably conclude that the Project site does not overlie liquefiable soils but if such soils are discovered during the required design-level geotechnical investigation, they can be adequately addressed to eliminate the liquefaction hazards prior to site redevelopment.

Response to Comment A-16

The Draft IS/MND, in addition to Comment Responses A-7 and A-8, effectively presents information to demonstrate that the Project would not conflict with the City of Pittsburg 2040 General Plan Goal 11-5, and its policies and actions regarding hazardous materials. The Project site is currently a paved parking lot within the Corteva property. The Corteva property has been heavily regulated by the local CUPA and state agencies for decades to strictly control the production, use, storage, transportation, and disposal of hazardous materials (Policy 11-P-5.1). As discussed in detail in Comment Response A-7, there is no substantial evidence that the Project site soil underlying the asphaltic concrete parking lot is currently impacted by legacy contamination and thus, soil and groundwater investigations have not been warranted. State regulatory databases do not indicate that regulatory action regarding hazardous materials contamination has occurred or is proposed on the Project site. The Draft IS/MND, therefore, does not present mitigation measures to address contamination. Unanticipated soils contamination would be addressed by the SMP (see Comments Response A-7, A-9 and Draft IS/MND page 54), which would investigate and remediate contaminated soils to reduce exposure to construction workers and future operations staff (see Goal 11-5, Policy 11-P-5.6, Action 11-A-5.a). The Draft IS/MND states that the Project must complete a Hazardous Material Business Plan (HMBP) due to the transportation, storage, and use of hazardous materials. It also needs to comply with CalARP by preparing an RMP to address emergency response and hazardous materials incidents in the City of Pittsburg (see Goal 11-5, Policy 11-P-5.1, -5.4, -5.5).

Response to Comment A-17

See Response to Comment A-7 through A-16 and A-18 through A-24.

Response to Comment A-18

Comment Noted. The Comment provides background information for the Project.

Response to Comment A-19

See Response to Comment A-14.

Response to Comment A-20

See Response to Comment A-7.

Response to Comment A-21

See Response to Comment A-12.

Response to Comment A-22

See Response to Comment A-13.

Response to Comment A-23

See Response to Comment A-11.

Response to Comment A-24

See Response to Comment A-8.

Response to Comment A-25

See Response to Comment A-7 through A-16 and A-18 through A-24.

Hi Maurice,

Thank you for sharing this report. The Tribe respectfully recommends that the final version of the IS/MND include the following changes to mitigation measures and that Lisjan Nation be notified immediately if any cultural resources of Native American origin are inadvertently discovered during the project.

To the measure concerning inadvertent discovery of human remains, we request the addition of this provision: There shall be no pictures taken or testing done on the Native American human remains.

B-1

We also request the incorporation of this additional mitigation measure concerning Tribal Cultural Resources, which may or may not also be archaeological resources:

Inadvertent discovery of Tribal Cultural Resources: If cultural resources of Native American origin are identified during grading or excavation of the proposed project, all ground disturbing activities within 50 feet shall cease until an archeologist has evaluated the nature and significance of the find as a historic property and a representative from the Confederated Villages of Lisjan Nation is consulted by the government agency. If the entity in consultation with the consulting Tribe(s), determines that the resource is a Tribal Cultural Resource and thus significant under CEQA, the entity shall retain a qualified archeologist and a Tribal monitor, at the applicant's expense, to prepare a mitigation plan, which shall be implemented in consultation with the consulting Tribe. The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is not feasible, the plan shall outline appropriate treatment of the resource in coordination with the consulting Tribe and, if applicable, a qualified archeologist. Examples of appropriate mitigation for Tribal Cultural Resources include, but are not limited to, protecting the cultural character and integrity of the resources, protecting traditional use of the resources, protecting the confidentiality of the resources, or heritage recovery.

Can you please share the final IS/MND once it is available? Thank you so much.

'Uni (Respectfully),

Lucy Gill, Cultural Resource Manager II
Confederated Villages of Lisjan Nation

Response to Comment B-1

To ensure the requests of the Confederated Villages of Lisjan Nation are implemented, the following would be a Condition of Project Approval:

There shall be no pictures taken or testing done on Native American human remains. If cultural resources of Native American origin are identified during grading or excavation of the proposed project, all ground disturbing activities within 50 feet shall cease until an archeologist has evaluated the nature and significance of the find as a historic property and a representative from the Confederated Villages of Lisjan Nation is consulted by the government agency. If the entity in consultation with the consulting Tribe(s), determines that the resource is a Tribal Cultural Resource and thus significant under CEQA, the entity shall retain a qualified archeologist and a Tribal monitor, at the applicant's expense, to prepare a mitigation plan, which shall be implemented in consultation with the consulting Tribe. The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is not feasible, the plan shall outline appropriate treatment of the resource in coordination with the consulting Tribe and, if applicable, a qualified archeologist. Examples of appropriate mitigation for Tribal Cultural Resources include, but are not limited to, protecting the cultural character and integrity of the resources, protecting traditional use of the resources, protecting the confidentiality of the resources, or heritage recovery.

Attachment A

Updated Health Risk Assessment Technical Report

March 7, 2025

Health Risk Assessment Technical Report

Pittsburg Iron Salt Manufacturing Facility

PREPARED BY:

RCH Group
Contact: *Mike Ratte, Senior Air Quality Scientist*

PREPARED FOR:

City of Pittsburg
Planning Division
65 Civic Avenue
Pittsburg, CA 94565

March 7, 2025

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Attachment: Health Risk Assessment Methodology, Assumptions, and Detailed Results

HEALTH RISK ASSESSMENT TECHNICAL REPORT

Pencco Iron Salts Manufacturing Facility

1.0 INTRODUCTION

A health impact assessment (HRA) has been completed for the Pencco Iron Salts Manufacturing Facility to evaluate the health impacts on nearby sensitive receptors. The proposed project consists of the construction and operation of an iron salts manufacturing facility on a property leased from Corteva that would be inside the fenced limits of the Corteva industrial complex in Pittsburg. The project site would include development of the facility, which includes the use of two existing buildings (to be used for an office and laboratory) on a 1.38-acre site. The iron salts made at this facility would ship to California's water treatment and wastewater treatment plants.

The health risk assessment (HRA) focuses on health impacts on existing residences, offsite workers, and educational facilities from emissions of toxic air contaminants (TAC)[1] such as diesel particulate matter (DPM)[2] from diesel equipment and haul truck emissions associated with the project construction activities and operational air toxics emissions from haul trucks, the cooling tower, and the scrubber. The HRA was conducted to determine the health impacts, in terms of excess cancer risk and non-cancer hazards, using the significance levels identified by the Bay Area Air Quality Management District (BAAQMD)'s *CEQA Air Quality Guidelines*.[3] In accordance with the BAAQMD *CEQA Air Quality Guidelines*, the HRA also evaluated concentrations of particulate matter equal to or less than 2.5 micrometers (fine particulate or $PM_{2.5}$ as combustion exhaust and fugitive dust). The HRA was prepared based on the California Office of Environmental Health Hazard Assessment (OEHHA)'s *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments.*[4]

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1 Toxic air contaminants are a broad class of compounds known to cause morbidity or mortality. TAC are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., gasoline service stations, dry cleaners). TAC are typically found in low concentrations, even near their source (e.g., diesel particulate matter near a freeway). Because chronic exposure can result in adverse health effects, TAC are regulated at the regional, state, and federal level.

2 In 1998, the California Air Resources Board classified diesel particulate matter as a toxic air contaminant, citing its potential to cause cancer and other health problems. The US Environmental Protection Agency concluded that long-term exposure to diesel engine exhaust is likely to pose a lung cancer hazard to humans and can also contribute to other acute and chronic health effects.

3 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, April 20, 2023, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

4 Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, February 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

The supporting information, methodology, assumptions, and detailed results associated with this HRA are provided in **Attachment A: Health Risk Assessment Methodology, Assumptions, and Detailed Results** at the end of this narrative.

2.0 PROJECT OVERVIEW

The manufacturing process involves dissolving iron ore and high-purity scrap iron with chlorine and hydrochloric Acid (HCL). These reactions occur in reactors designed for the corrosive nature of this process. The iron salts manufactured at the proposed facility would ship to California's water treatment and wastewater treatment plants.

Trucks would deliver iron ore (magnetite), scrap steel, and spent pickling liquor (SPL or ferrous chloride) to the facility for the raw iron material. The facility would also consume HCL and chlorine, which Pencco would purchase from Corteva or K2. The chlorine would be transported to the facility by pipeline, all within the Corteva industrial complex.

The HCL would be transported to the facility initially by tanker truck and then by pipeline once an HCL pipeline is available. The HCL pipeline from Corteva would extend from the existing line at the rail car spot adjacent to F Street from the east and would require approximately 120 feet of piping to the project tie in point. The facility would also use 98 percent sulfuric acid (H_2SO_4) in iron salts production and liquid oxygen. Both would be transported to the facility by tanker trucks. There would also be a need to consume 50 percent sodium hydroxide (NaOH) in the air scrubber for the facility to control fugitive emissions of HCL and chlorine. NaOH is a corrosive liquid that would also be delivered by tanker truck. Exit the property via Loveridge Road and utilize Highway 4 (primarily heading west).

Construction of the project would occur intermittently over approximately 14 months from May 2025 through July 2026. Construction activities would typically take place Monday through Friday, 8 a.m. to 5 p.m. Construction of the project would require demolition, site preparation, grading, building construction/equipment installation, paving, and architectural coating. Construction would require the export of 16,000 cubic yards of soil to make room for the recessed concrete containment floor. Demolition would consist of removing 27,000 square feet of existing pavement to make room for the new concrete containment area and truck scales. New paving would consist of 26,000 square feet of pavement and 1,000 square feet of asphalt for the new concrete containment area.

The project site consists of a 1.38-acre (59,960.6 square feet) property leased from Corteva at 901 Loveridge Road in Pittsburg, California. The parcel is zoned General Industrial and is designated Industrial in the City of Pittsburg 2040 General Plan. The project site is fully developed and consists of existing buildings and pavement in the Corteva industrial complex. **Figure 1: Project Location** displays the project location. **Figure 1: Project Site Plan** displays the project site plan including the location of the cooling tower and scrubber stack.

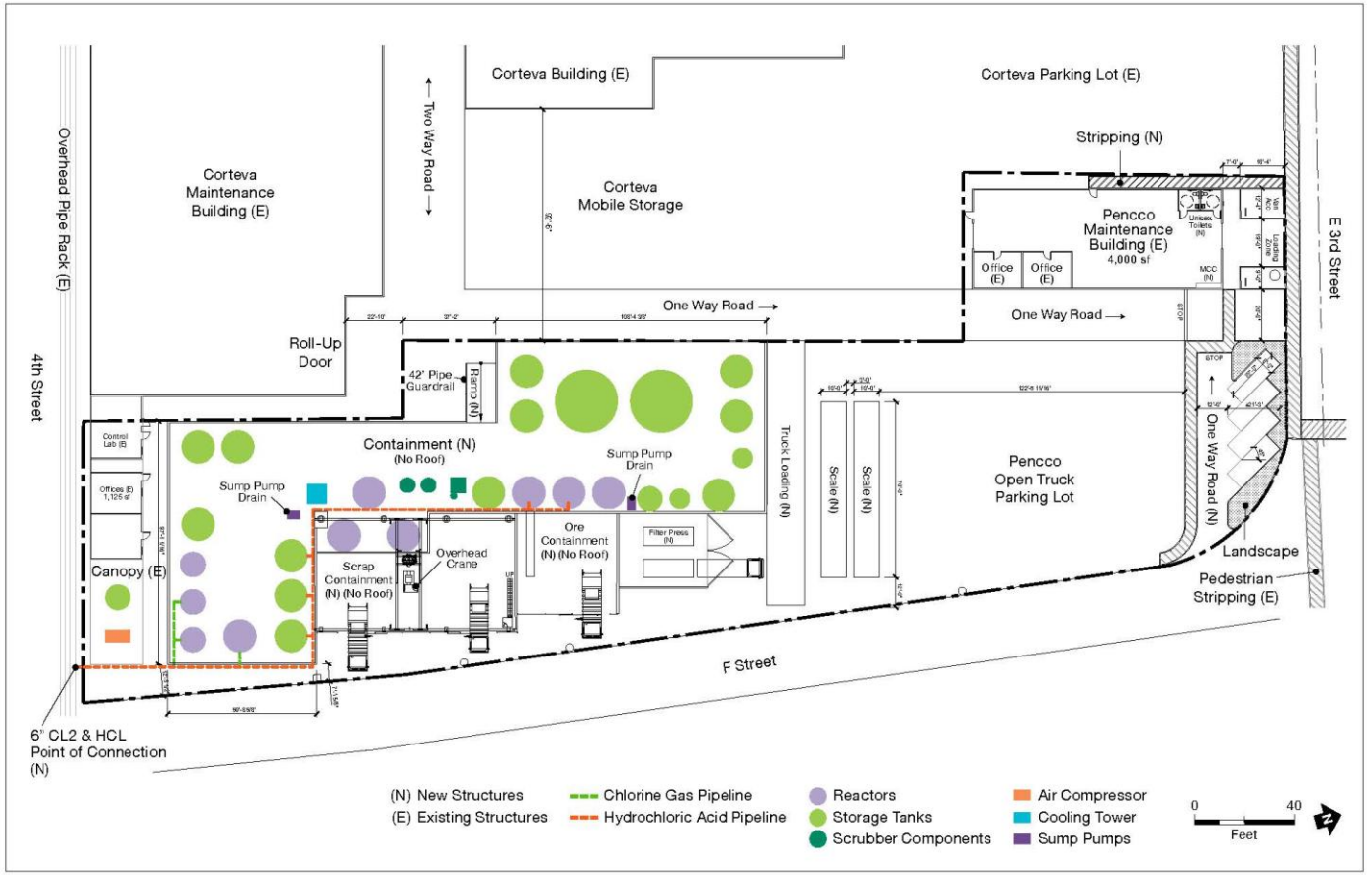
Figure 1
Project Location



Source: RCH Group; Google Earth Pro, 2024

RCHGROUP
planning & environmental consulting

Figure 2
Project Site Plan



Source: Atelier 424, RCH Group, 2024

3.0 HEALTH IMPACT ANALYSIS

Short-term and long-term health impacts related to the construction and operation of the project were evaluated. The analysis focuses on annual emissions from construction and operation of the facility given that health impacts from DPM and other air toxics are evaluated over a year or longer period. Regulatory models used to estimate health impacts include:

- California Air Pollution Officers Association (CAPCOA) CalEEMod (California Emissions Estimator Model Version 2022.1)[5] is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutants and GHG emissions associated with both construction and operations from a variety of land use projects. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use.
- AERMOD (American Meteorological Society/USEPA Regulatory Model, Version 24142) is an atmospheric dispersion model which can simulate point, area, volume, and line emissions sources and has the capability to include simple, intermediate, and complex terrain along with meteorological conditions and multiple receptor locations.[6,7] AERMOD is commonly executed to yield 1-hour maximum and annual average concentrations (in $\mu g/m^3$) at each receptor.

The cooling tower would emit volatile organic compounds (VOC) as reactive organic gases (ROG), particulate matter less than 10 micrometers (coarse particulate or PM_{10}), and chloroform. The PM_{10} emissions are the result of the total dissolved solids in the circulating water which are carried out with the water that is entrained in the air being discharged from the tower. VOC emissions typically result from the leakage from process heat exchangers that service hydrocarbon process streams as well as from chemical treatment with VOC containing material added to the circulating water. VOC emissions are expected from cooling towers used in refineries and chemical plants, where the circulating water is used to cool down the process stream. Chloroform, an air toxic, emissions are typically from the toxic constituents of PM_{10} and/or VOC in the circulating water. USEPA AP-42, Compilation of Air Pollutant Emission Factors (VOC - AP-42, Section 5.1, Table 5.1-2 PM_{10} - AP-42, Section 13.4, Table 13.4-1) was used to estimate the VOC, PM_{10}, and chloroform emission rates. The emission factors have been developed and compiled from source test data, material balance studies, and engineering estimates.[8,9]

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5 California Air Pollution Officers Association, *California Emissions Estimator Model User Guide Version 2022.1*, April 2022, http://www.caleemod.com/

6 US Environmental Protection Agency, Preferred/Recommended Models, *AERMOD Modeling System*, https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models#aermod

7 Title 40 CFR Part 51, *Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions; Final Rule,* https://www.epa.gov/sites/default/files/2020-09/documents/appw_17.pdf

8 US Environmental Protection Agency, AP 42, Compilation of Air Pollutant Emission Factors, Fifth Edition, Volume I, https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors

The HCl emissions from the scrubber were estimated. According to the vendor information, the HCl will be treated by a 2-stage system. The uncontrolled inlet HCl concentration is 20 ppm for the design. At the outlet of the stage 1 scrubber, the HCl concentration would be 0.6 ppm. At the outlet of the stage 2 scrubber, the HCl concentration would be 0.00006 ppm at a flow rate of 12,690 cubic feet per minute (at temperature at 140 F, pressure 28.82 inches of Hg).

The uncontrolled HCL emissions would be 1.42 pounds per hour and 12, 418 pounds per year. The stage 1 HCL emissions (with 97 percent control efficiency) would be 0.04 pounds per hour and 373 pounds per year. The HCl emissions from the Stage 2 outlet (with 99.9 percent control efficiency) would be 0.0000044 pounds per hour 0.038 pounds per year.

Threshold of Significance

The thresholds and methodologies from the BAAQMD's *CEQA Air Quality Guidelines* were used to evaluate the potential health impacts of construction and operation of the project. The thresholds of significance applied to assess project-level air quality impacts are:

- Exposure of persons by siting a new source or a new sensitive receptor to substantial levels of TAC resulting in (a) a cancer risk level greater than 10 in one million, (b) a noncancerous risk (chronic or acute) hazard index greater than 1.0, or (c) an increase of annual average $PM_{2.5}$ of greater than 0.3 micrograms per cubic meter ($\mu g/m^3$). For this threshold, sensitive receptors include residential uses, schools, parks, daycare centers, nursing homes, and medical centers; or

Assessment of a significant cumulative impact if it would result in:

- Exposure of persons, by siting a new source or a new sensitive receptor, to substantial levels of TAC during either construction or operation resulting in (a) a cancer risk level greater than 100 in a million, (b) a noncancer risk (chronic or acute) hazard index greater than 10.0, or (c) annual average $PM_{2.5}$ of greater than 0.8 $\mu g/m^3$.

Health Impact Evaluation

This HRA was conducted following methodologies in OEHHA's *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. This was accomplished by applying the estimated concentrations at the receptors analyzed to the established cancer risk estimates and acceptable reference concentrations for non-cancer health effects.

Recent OEHHA's revisions to its *Guidance Manual* were primarily designed to ensure that the greater sensitivity of children to cancer and other health risks is reflected in HRA. For example, OEHHA now recommends that risks be analyzed separately for multiple age groups, focusing especially on young children and teenagers, rather than the past practice of analyzing risks to the general population, without distinction by age. OEHHA also now recommends that statistical "age sensitivity factors" be incorporated into an HRA, and that children's relatively high breathing rates be accounted for. On the other hand, the *Guidance Manual* revisions also include some changes that would reduce calculated

[9] South Coast Air Quality Management District, Guidelines for Calculating Emissions from Cooling Towers, December 2022, https://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/guidelines-for-calculating-emissions-from-cooling-towers-2022.pdf?sfvrsn=6

health risks. For example, under the former guidance, OEHHA recommended that residential cancer risks be assessed by assuming 70 years of exposure at a residential receptor; under the *Guidance Manual*, this assumption is lessened to 30 years.

Health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Individual cancer risk is the likelihood that a person exposed to air toxic concentrations over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. The maximally exposed individual (MEI) represents the worst–case risk estimate, based on a theoretical person continuously exposed for a lifetime at the point of highest compound concentration in the air. This is a highly conservative assumption since most people do not remain at home all day and on average residents change residences every 11 to 12 years. In addition, this assumption assumes that residents are experiencing outdoor concentrations for the entire exposure period.

This HRA analyzes the cancer risks to sensitive receptors in the vicinity of the project, using emission rates (in pounds per hour and pounds per year) based on CalEEMod. Air toxics emission rates were input into the USEPA's AERMOD atmospheric dispersion model to calculate ambient air concentrations at receptors in the project vicinity. This HRA is intended to provide a worst–case estimate of the increased exposure by employing a standard emission estimation program, an accepted pollutant dispersion model, approved toxicity factors, and conservative exposure parameters.

In accordance with OEHHA *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments,* this HRA was accomplished by applying the highest estimated concentrations of TAC at the receptors analyzed to the established cancer potency factors and acceptable reference concentrations for non-cancer health effects. Increased cancer risks were calculated using the modeled air toxics concentrations and OEHHA-recommended methodologies for both child exposure (3rd trimester through two years of age) and adult exposure. The cancer risk calculations were based on applying the OEHHA-recommended age sensitivity factors and breathing rates, as well as fraction of time at home and an exposure duration of 30 years, to the air toxics concentration exposures. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing air pollutants. The supporting methodology and assumptions used in this HRA are provided in **Attachment A: Health Risk Assessment Methodology, Assumptions, and Detailed Results** at the end of this narrative.

These conservative methodologies tend to overestimate both non-carcinogenic and carcinogenic health risk, possibly by an order of magnitude or more. Therefore, for carcinogenic risks, the actual probabilities of cancer formation in the populations of concern due to exposure to carcinogenic pollutants are likely to be lower than the risks derived using this HRA methodology. The extrapolation of toxicity data in animals to humans, the estimation of concentration prediction methods within dispersion models; and the variability in lifestyles, fitness and other confounding factors of the human population also contribute to the overestimation of health impacts. Therefore, the results of this HRA are highly overstated.

Some receptors are considered more sensitive to air pollutants than others, because of preexisting health problems, proximity to the emissions source, or duration of exposure to air pollutants. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because the very young, the old, and the infirm are more

susceptible to respiratory infections and other air quality-related health problems than the general public. Residential areas are also considered sensitive to poor air quality because people in residential areas are often at home for extended periods. Recreational land users are moderately sensitive to air pollution because of vigorous exercise associated with recreation places having a high demand on respiratory system function.

Modeling locations were placed at offsite worker receptors to estimate health impacts due to proposed project construction and operations. Numerous offsite workers are located within 1,000 feet of the project site. Modeling locations were placed at nearby buildings in which offsite workers would gather, along the facility property line, and within a cartesian grid with spacing of 50 meters from the proposed project. This results in approximately 270 modeling receptors.

Martin Luther King Junior High School is located approximately 1.2 miles to the southwest of the project site. Turner Elementary School is located approximately 1.6 miles to the south of the project site. Antioch Charter Academy is located approximately 2.0 miles to the southeast of the project site. Maria Vista Elementary School is located approximately 1.8 miles to the west of the project site. Little People's Preschool is located approximately 1.1 miles to the southwest of the project site. Modeling receptors were also included for these educational facilities.

The nearest residential land uses (in the area bordered by the Pittsburg-Antioch Highway, Central Addition Park, Manor Street, and the railroad tracks) are located approximately 1.0 miles to the southwest of the project site. There are also residences located to the south of the project site (in an area bordered by California Delta Highway and Leland Street), within approximately 1.2 miles and residences located to the southeast of the project site (in an area bordered by Auto Center Drive, 16th Street, and Crestview Drive), within approximately 1.7 miles. Modeling receptors were also included for these residential land uses.

The HRA are presented based on the use of meteorological data from Concord Buchanan Airport and Dow monitoring stations. **Attachment A: Health Risk Assessment Methodology, Assumptions, and Detailed Results** provides further details related to the location of modeling receptors.

Construction Health Impacts at Existing Residences

The following describes the HRA results associated with existing residences due to unmitigated project construction activities (i.e., offroad equipment and haul trucks). As shown in **Table 1A: Estimated Unmitigated Construction Health Impacts at Existing Residences – Concord** and **Table 1B: Estimated Unmitigated Construction Health Impacts at Existing Residences – Dow**, the maximum cancer risk from unmitigated project construction emissions for an existing residence would be 0.18 and 1.08 per million, respectively. Thus, the cancer risk due to unmitigated construction activities is less than the BAAQMD threshold of 10 per million and would be less than significant.

Table 1A: Estimated Unmitigated Construction Health Impacts at Existing Residences - Concord

Source	Cancer Risk (child/adult)	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Proposed Project Construction	0.18/0.01	<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Table 1B: Estimated Unmitigated Construction Health Impacts at Existing Residences - Dow

Source	Cancer Risk (child/adult)	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Proposed Project Construction	1.08/0.06	<0.01	0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

The following describes the HRA results associated with existing residences due to mitigated project construction activities. As shown in **Table 2A: Estimated Mitigated Construction Health Impacts at Existing Residences - Concord** and **Table 2B: Estimated Mitigated Construction Health Impacts at Existing Residences – Dow**, the maximum cancer risk from mitigated project construction emissions for an existing residence would be 0.05 and 0.19 per million, respectively. Thus, the cancer risk due to mitigated construction activities are less than the BAAQMD threshold of 10 per million and would be less than significant.

Table 2A: Estimated Mitigated Construction Health Impacts at Existing Residences - Concord

Source	Cancer Risk (child/adult)	Hazard Impact	$PM_{2.5}$ Concentration
Mitigated Proposed Project Construction	0.05/<0.01	<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Table 2B: Estimated Mitigated Construction Health Impacts at Existing Residences - Dow

Source	Cancer Risk (child/adult)	Hazard Impact	$PM_{2.5}$ Concentration
Mitigated Proposed Project Construction	0.19/0.01	<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Both acute (short-term) and chronic (long-term) adverse health impacts unrelated to cancer are measured against a hazard index (HI), which is defined as the ratio of the predicted incremental DPM exposure concentration from the project to a reference exposure level (REL) that could cause adverse health effects. The REL are published by OEHHA based on epidemiological research. The ratio (referred to as the Hazard Quotient [HQ]) of each non-carcinogenic substance that affects a certain organ system is added to produce an overall HI for that organ system. The overall HI is calculated for each organ system. The impact is considered to be significant if the overall HI for the highest-impacted organ system is greater than 1.0.

Of note, there are a cancer potency factor and a chronic hazard index, but no acute hazard index associated with DPM.[10] The chronic reference exposure level for DPM was established by the California OEHHA[11] as 5 μg/m^3. Thus, the project-related annual concentration of DPM cannot exceed 5.0 μg/m^3; resulting in a chronic HI of greater than 1.0 (i.e., DPM annual concentration/5.0 μg/m^3). The chronic HI would be less than 0.01 at the existing residences. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant.

Dispersion modeling also estimated the exposure of sensitive receptors to project-related concentrations of $PM_{2.5}$. The BAAQMD *Air Quality Guidelines* requires inclusion of $PM_{2.5}$ exhaust and fugitive dust emissions in this analysis. The project's annual $PM_{2.5}$ concentration from construction activities would be less than 0.01 μg/m^3 at the existing residences. Thus, the annual $PM_{2.5}$ concentration due to project construction (combustion exhaust and fugitive dust) would be below the BAAQMD threshold of 0.3 μg/m^3 and would be considered less than significant.

Construction Health Impacts at Existing Schools

The following describes the HRA results associated with existing schools due to unmitigated project construction activities. As shown in **Table 3A: Estimated Unmitigated Construction Health Impacts at Existing Schools – Concord** and **Table 3B: Estimated Unmitigated Construction Health Impacts at Existing Schools – Dow**, the maximum cancer risk from unmitigated project construction emissions for existing schools would be 0.01 and 0.07 per million, respectively. Thus, the cancer risk due to unmitigated construction activities is less than the BAAQMD threshold of 10 per million and would be less than significant.

Table 3A: Estimated Unmitigated Construction Health Impacts at Existing Schools - Concord

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Proposed Project Construction	0.01	<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Table 3B: Estimated Unmitigated Construction Health Impacts at Existing Schools - Dow

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Proposed Project Construction	0.07	<0.01	0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

The following describes the HRA results associated with existing residences due to mitigated project construction activities. As shown in **Table 4A: Estimated Mitigated Construction Health Impacts at Existing Schools - Concord** and **Table 4B: Estimated Mitigated Construction Health Impacts at Existing Schools – Dow**, the maximum cancer risk from mitigated project construction emissions for existing schools would be less than 0.01 and 0.02 per million, respectively. Thus, the cancer risk due to mitigated

10 Office of Environmental Health Hazards Assessment Chemical Database – Air, http://oehha.ca.gov/chemicals

11 California Office of Environmental Health Hazards Assessment - Acute, 8-hour, and Chronic Reference Exposure Levels, June 2014, http://www.oehha.ca.gov/air/allrels.html

construction activities are less than the BAAQMD threshold of 10 per million and would be less than significant.

Table 4A: Estimated Mitigated Construction Health Impacts at Existing Schools - Concord

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Mitigated Proposed Project Construction	<0.01	<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Table 4B: Estimated Mitigated Construction Health Impacts at Existing Schools - Dow

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Mitigated Proposed Project Construction	0.02	<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

The mitigated chronic HI would be less than 0.01 at the existing schools. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant.

The project's mitigated annual $PM_{2.5}$ concentration from construction activities would be less than 0.01 $\mu g/m^3$ at the existing schools. Thus, the annual $PM_{2.5}$ concentration due to project construction (combustion exhaust and fugitive dust) would be below the BAAQMD threshold of 0.3 $\mu g/m^3$ and would be considered less than significant.

Construction Health Impacts at Offsite Workers

The following describes the HRA results associated with existing residences due to unmitigated project construction activities. As shown in **Table 5A: Estimated Unmitigated Construction Health Impacts at Offsite Workers – Concord** and **Table 5B: Estimated Unmitigated Construction Health Impacts at Offsite Workers - Dow**, the maximum cancer risk from unmitigated project construction emissions for offsite workers would be 1.9 and 2.0 per million, respectively. The maximum exposed individual worker (MEIW) for construction activities is located to the east of the project site. Thus, the cancer risk due to unmitigated construction activities is above the BAAQMD threshold of 10 per million and would be potentially significant.

Table 5A: Estimated Unmitigated Construction Health Impacts at Offsite Workers - Concord

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Proposed Project Construction	1.85	0.09	0.82
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	Yes

Table 5B: Estimated Unmitigated Construction Health Impacts at Offsite Workers - Dow

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Proposed Project Construction	2.01	0.09	0.89
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	Yes

The following describes the HRA results associated with existing residences due to mitigated project construction activities. As shown in **Table 6A: Estimated Mitigated Construction Health Impacts at Offsite Workers – Concord** and **Table 6B: Estimated Mitigated Construction Health Impacts at Offsite Workers - Dow**, the maximum cancer risk from mitigated project construction emissions for offsite workers would be 0.26 and 0.28 per million, respectively. Thus, the cancer risk due to mitigated construction activities are less than the BAAQMD threshold of 10 per million and would be less than significant.

Table 6A: Estimated Mitigated Construction Health Impacts at Offsite Workers - Concord

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Mitigated Proposed Project Construction	0.26	0.01	0.23
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Table 6B: Estimated Mitigated Construction Health Impacts at Offsite Workers - Dow

Source	Cancer Risk	Hazard Impact	$PM_{2.5}$ Concentration
Mitigated Proposed Project Construction	0.28	0.01	0.27
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

The mitigated chronic HI would be 0.01 at offsite workers. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant.

The project's unmitigated annual $PM_{2.5}$ concentration from construction activities would be 0.82 and 0.89 µg/m^3 at offsite workers, respectively. Thus, the annual $PM_{2.5}$ concentration due to project construction (combustion exhaust and fugitive dust) would be potentially above the BAAQMD threshold of 0.3 µg/m^3. With **Mitigation Measures AQ-1 and AQ-2**, the project's annual $PM_{2.5}$ concentration from construction activities would be 0.23 and 0.27 µg/m^3 at offsite workers, respectively. Thus, the annual $PM_{2.5}$ concentration due to project construction (combustion exhaust and fugitive dust) would be less than the BAAQMD threshold of 0.3 µg/m^3 and less than significant with mitigation.

Mitigation Measure AQ-1: Construction-related activities, such as soil disturbance, grading, and material hauling, can also result in fugitive dust emissions. Based on the most recent BAAQMD's *CEQA Air Quality Guidelines,* for a project to have a less-than-significant air quality impact related to construction-related fugitive dust emissions, the project must implement the following basic best management practices:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.

- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

Mitigation Measure AQ-2: The applicant shall implement the following measures during construction to further reduce construction exhaust emissions:

All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall utilize diesel engines that are USEPA certified "Tier 4 final" emission standards for particulate matter. Prior to the issuance of any demolition/construction permits, the construction contractor shall submit specifications of the equipment to be used during construction and the City of Pittsburg shall confirm this requirement is met.[12]

Equipment such as air compressors, concrete/industrial saws, forklifts, light stands, manlifts, pumps, and welders shall be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators.

[12] USEPA and CARB have implemented regulations and a tiering system to reduce emissions from off-road equipment with increasing combustion efficiency (i.e., decreasing emissions) where Tier 1 is the least efficient (greatest emissions) and Tier 4 is the most efficient (least emissions). The regulations have been implemented over time such that Tier 1 was phased out in the 1990's and Tier 2 was required, followed by implementation of Tier 3 and Tier 4 by 2015 with a phase out of Tier 2.

Operation Health Impacts at Existing Residences

Project operational sources of air toxics include haul trucks, the cooling tower, and the scrubber. The following describes the HRA results associated with existing residences due to project operation (cooling tower, scrubber, and haul trucks). The maximum cancer risk from operations for a residential receptor would be 0.03 and 0.06 per million, respectively. Thus, the cancer risk due to operations is less than the BAAQMD threshold of 10 per million and would be less than significant. As shown in **Table 7A: Estimated Operational Health Impacts at Existing Residences - Concord**, and **Table 7B: Estimated Operational Health Impacts at Existing Residences - Dow**, the chronic HI with stage 2 scrubber would be less than 0.01 at the existing residences. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant. The project's annual $PM_{2.5}$ concentration from construction activities would be less than 0.01 $\mu g/m^3$ at the existing residences. Thus, the annual $PM_{2.5}$ concentration due to project operations would be below the BAAQMD threshold of 0.3 $\mu g/m^3$ and would be considered less than significant.

Table 7A: Estimated Operational Health Impacts at Existing Residences - Concord

Source	Cancer Risk (child/adult)	Hazard Impact (chronic/acute)	$PM_{2.5}$ Concentration
Proposed Project Operation (Uncontrolled Scrubber)	0.03/0.01	0.12/<0.01	<0.01
Proposed Project Operation (Stage 1 Scrubber)	0.03/0.01	<0.01/<0.01	<0.01
Proposed Project Operation (Stage 2 Scrubber)	0.03/0.01	<0.01/<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Table 7B: Estimated Operational Health Impacts at Existing Residences - Dow

Source	Cancer Risk (child/adult)	Hazard Impact (chronic/acute)	$PM_{2.5}$ Concentration
Proposed Project Operation (Uncontrolled Scrubber)	0.06/0.02	0.30/<0.01	<0.01
Proposed Project Operation (Stage 1 Scrubber)	0.06/0.02	0.01/<0.01	<0.01
Proposed Project Operation (Stage 2 Scrubber)	0.06/0.02	<0.01/<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Operation Health Impacts at Existing Schools

Project operational sources of air toxics include haul trucks, the cooling tower, and the scrubber. The following describes the HRA results associated with existing schools due to project operation. The maximum cancer risk from operations for a school receptor would be 0.01 and 0.03 per million, respectively. Thus, the cancer risk due to operations is less than the BAAQMD threshold of 10 per million and would be less than significant. As shown in **Table 8A: Estimated Operational Health Impacts at Existing Schools – Concord** and **Table 8B: Estimated Operational Health Impacts at Existing Schools - Dow**, the chronic HI with stage 2 scrubber would be less than 0.01 at the existing schools. The chronic HI would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant. The project's annual $PM_{2.5}$ concentration from operations would be less than 0.01 $\mu g/m^3$ at the existing schools. Thus, the annual $PM_{2.5}$ concentration due to project

operation would be below the BAAQMD threshold of 0.3 µg/m^3 and would be considered less than significant.

Table 8A: Estimated Operational Health Impacts at Existing Schools - Concord

Source	Cancer Risk	Hazard Impact (chronic/acute)	$PM_{2.5}$ Concentration
Proposed Project Operation (Uncontrolled Scrubber)	0.01	0.08/0.01	<0.01
Proposed Project Operation (Stage 1 Scrubber)	0.01	<0.01/<0.01	<0.01
Proposed Project Operation (Stage 2 Scrubber)	0.01	<0.01/<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Table 8B: Estimated Operational Health Impacts at Existing Schools - Dow

Source	Cancer Risk	Hazard Impact (chronic/acute)	$PM_{2.5}$ Concentration
Proposed Project Operation (Uncontrolled Scrubber)	0.03	0.18/0.01	<0.01
Proposed Project Operation (Stage 1 Scrubber)	0.03	0.01/<0.01	<0.01
Proposed Project Operation (Stage 2 Scrubber)	0.03	<0.01/<0.01	<0.01
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Operation Health Impacts at Offsite Workers

Project operational sources of air toxics include haul trucks, the cooling tower, and the scrubber. The following describes the HRA results associated with offsite workers due to project operation. The maximum cancer risk from operations for an offsite worker receptor would be 0.64 and 0.80 per million, respectively. Thus, the cancer risk due to operations is less than the BAAQMD threshold of 10 per million and would be less than significant. As shown in **Table 9A: Estimated Operational Health Impacts at Offsite Workers – Concord** and **Table 9B: Estimated Operational Health Impacts at Offsite Workers - Dow**, the uncontrolled chronic HI would be 12.5 and 17.1 at offsite workers, respectively. The uncontrolled chronic HI would be above the project-level threshold of 1 and the impact of the project would therefore be potentially significant. However, the facility and scrubbers would not operate without the use of stage 1 and stage 2 conditions. The chronic HI with stage 2 would be less than 0.01 at offsite workers. The chronic HI with stage 1 and 2 would be below the project-level threshold of 1 and the impact of the project would therefore be less than significant. The project's annual $PM_{2.5}$ concentration from operations would be 0.04 and 0.05 µg/m^3 at offsite workers, respectively. Thus, the annual $PM_{2.5}$ concentration due to project operation would be below the BAAQMD threshold of 0.3 µg/m^3 and would be considered less than significant.

Table 9A: Estimated Operational Health Impacts at Offsite Workers - Concord

Source	Cancer Risk	Hazard Impact (chronic/acute)	$PM_{2.5}$ Concentration
Proposed Project Operation (Uncontrolled Scrubber)	0.64	12.5/0.05	0.04
Proposed Project Operation (Stage 1 Scrubber)	0.64	0.37/<0.01	0.04
Proposed Project Operation (Stage 2 Scrubber)	0.64	<0.01/<0.01	0.04
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Table 9B: Estimated Operational Health Impacts at Offsite Workers - Dow

Source	Cancer Risk	Hazard Impact (chronic/acute)	$PM_{2.5}$ Concentration
Proposed Project Operation (Uncontrolled Scrubber)	0.80	17.1/0.06	0.05
Proposed Project Operation (Stage 1 Scrubber)	0.80	0.51/<0.01	0.05
Proposed Project Operation (Stage 2 Scrubber)	0.80	<0.01/<0.01	0.05
Significance Threshold	10.0	1.00	0.30
Potentially Significant (Yes or No)?	No	No	No

Construction plus Operation Health Impacts

The health impacts for construction plus operations at the existing residences and existing schools are well below the BAAQMD thresholds of significance. The maximum cancer risk from project mitigated construction plus operational emissions for offsite workers would be 0.09 and 1.08 per million, respectively. Thus, the cancer risk due to operations is less than the BAAQMD threshold of 10 per million and would be less than significant.

4.0 SUMMARY

The health impacts due to construction activities and operations at nearby sensitive receptors (residence, schools, and off-site workers) would be less than significant with mitigation.

Attachment A - Health Risk Assessment

- Methodology and Assumptions
- Construction Results - Concord
- Construction Results - Dow
- Operational Results - Concord
- Operational Results - Dow
- AERMOD Data Summary – Concord
- AERMOD Data Summary - Dow
- Cooling Tower Data
- Scrubber Data

Attachment A

Health Risk Assessment Methodology and Assumptions

A health risk assessment (HRA) is accomplished in four steps: 1) hazards identification, 2) exposure assessment, 3) toxicity assessment, and 4) risk characterization. These steps cover the estimation of air emissions, the estimation of the air concentrations resulting from a dispersion analysis, the incorporation of the toxicity of the pollutants emitted, and the characterization of the risk based on exposure parameters such as breathing rate, age adjustment factors, and exposure duration; each depending on receptor type (i.e., residence, school, daycare centers, hospitals, senior care facilities, recreational areas, adult, infant, child, offsite worker).

This HRA was conducted in accordance with technical guidelines developed by federal, state, and regional agencies, including U.S. Environmental Protection Agency (USEPA), California Environmental Protection Agency (CalEPA), California Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*.[1] This HRA addresses the emissions from construction activities including onsite equipment and haul trucks. Specific focus is on diesel particulate matter (DPM) and particulate matter equal to or less than 2.5 micrometers (fine particulate or $PM_{2.5}$) emissions. Gasoline-fueled vehicles emit air toxics in much smaller quantities and toxicity levels compared to DPM. Thus, gasoline-fueled emission sources were not included in the HRA. Secondly, air toxics emissions from project operations were also analyzed due to emissions from cooling tower and scrubber.

According to CalEPA, a HRA should not be interpreted as the expected rates of cancer or other potential human health effects, but rather as estimates of potential risk or likelihood of adverse effects based on current knowledge, under a number of highly conservative assumptions and the best assessment tools currently available.

TERMS AND DEFINITIONS

As the practice of conducting a HRA is particularly complex and involves concepts that are not altogether familiar to most people, several terms and definitions are provided that are considered essential to the understanding of the approach, methodology and results:

Acute effect – a health effect (non-cancer) produced within a short period of time (few minutes to several days) following an exposure to toxic air contaminants (TAC).

Cancer risk – the probability of an individual contracting cancer from a lifetime (i.e., 70 year) exposure to TAC such as DPM in the ambient air.

Chronic effect – a health effect (non-cancer) produced from a continuous exposure occurring over an extended period of time (weeks, months, years).

Hazard Index (HI) – the unitless ratio of an exposure level over the acceptable reference dose. The HI can be applied to multiple compounds in an additive manner.

[1] Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html.

Hazard Quotient (HQ) – the unitless ratio of an exposure level over the acceptable reference dose. The HQ is applied to individual compounds.

Toxic Air Contaminants – any air pollutant that is capable of causing short-term (acute) and/or long-term (chronic or carcinogenic, i.e., cancer causing) adverse human health effects (i.e., injury or illness). The current California list of TAC lists approximately 200 compounds, including particulate emissions from diesel-fueled engines.

Human Health Effects - comprise disorders such as eye watering, respiratory or heart ailments, and other (i.e., non-cancer) related diseases.

Health Risk Assessment – an analysis designed to predict the generation and dispersion of TAC in the outdoor environment, evaluate the potential for exposure of human populations, and to assess and quantify both the individual and population-wide health risks associated with those levels of exposure.

Incremental – under CEQA, the net difference (or change) in conditions or impacts when comparing the baseline to future year project conditions.

Maximum exposed individual (MEI) – an individual assumed to be located at the point where the highest concentrations of TAC, and therefore, health risks are predicted to occur.

Non-cancer risks – health risks such as eye watering, respiratory or heart ailments, and other non-cancer related diseases.

Receptors – the locations where potential health impacts or risks are predicted (i.e., schools, residences, and recreational sites).

LIMITATIONS AND UNCERTAINTIES

There are a number of important limitations and uncertainties commonly associated with a HRA due to the wide variability of human exposures to TAC, the extended timeframes over which the exposures are evaluated, and the inability to verify the results. Limitations and uncertainties associated with the HRA and identified by the CalEPA include: (a.) lack of reliable monitoring data; (b.) extrapolation of toxicity data in animals to humans; (c.) estimation errors in calculating TAC emissions; (d.) concentration prediction errors with dispersion models; and (e.) the variability in lifestyles, fitness and other confounding factors of the human population. This HRA was performed using the best available data and methodologies, notwithstanding the following uncertainties:

- There are uncertainties associated with the estimation of emissions from project activities. Where project-specific data, such as emission factors, are not available, default assumptions in emission models were used.
- The limitations of the air dispersion model provide a source of uncertainty in the estimation of exposure concentrations. According to USEPA, errors due to the limitation of the algorithms

implemented in the air dispersion model in the highest estimated concentrations of +/- 10 percent to 40 percent are typical.[2]

- The source parameters used to model emission sources add uncertainty. For all emission sources, the source parameters used source-specific, recommended as defaults, or expected to produce more conservative results. Discrepancies might exist in actual emissions characteristics of an emission source and its representation in the dispersion model.

- The exposure duration estimates do not take into account that people do not usually reside at the same location for 30 years and that other exposures (i.e., school children) are also of much shorter durations than was assumed in this HRA. This exposure duration is a highly conservative assumption, since most people do not remain at home all day and on average residents change residences every 11 to 12 years. In addition, this assumption adopts that residents are experiencing outdoor concentrations for the entire exposure period.

- For the risk and hazards calculations as well as the cumulative health impact, numerous assumptions must be made in order to estimate human exposure to pollutants. These assumptions include parameters such as breathing rates, exposure time and frequency, exposure duration, and human activity patterns. While a mean value derived from scientifically defensible studies is the best estimate of central tendency, most of the exposure variables used in this HRA are high-end estimates. The combination of several high-end estimates used as exposure parameters may substantially overestimate pollutant intake. The excess lifetime cancer risks calculated in this HRA are therefore likely to be higher than may be required to be protective of public health.

- The Cal/EPA cancer potency factor for DPM was used to estimate cancer risks associated with exposure to DPM emissions from construction activities. However, the cancer potency factor derived by Cal/EPA for DPM is highly uncertain in both the estimation of response and dose. In the past, due to inadequate animal test data and epidemiology data on diesel exhaust, the International Agency for Research on Cancer (IARC), a branch of the World Health Organization, had classified DPM as Probably Carcinogenic to Humans (Group 2); the USEPA had also concluded that the existing data did not provide an adequate basis for quantitative risk assessment.[3] However, based on two recent scientific studies,[4] IARC recently re-classified DPM as Carcinogenic to Humans to Group 1,[5] which means that the agency has determined that there is "sufficient evidence of carcinogenicity" of a substance in humans and represents the strongest

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[2] US Environmental Protection Agency, *Guideline on Air Quality Models (Revised), 40 Code of Federal Regulations, Part 51, Appendix W,* November 2005

[3] US Environmental Protection Agency, *Health Assessment Document for Diesel Engine Exhaust*, May 2002, https://cfpub.epa.gov/si/si_public_record_report.cfm?dirEntryId=29060

[4] Attfield MD, Schleiff PL, Lubin JH, Blair A, Stewart PA, Vermeulen R, Coble JB, Silverman DT, *The Diesel Exhaust in Miners Study: A Nested Case-Control Study of Lung Cancer and Diesel Exhaust*, June 2012, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3369553/

[5] International Agency for Research on Cancer, *Diesel Engine Exhaust Carcinogenic*, June 2012, https://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf

weight-of-evidence rating in IARC's carcinogen classification scheme. This determination by the IARC may provide additional impetus for the USEPA to identify a quantitative dose-response relationship between exposure to DPM and cancer.

In summary, the estimated health impacts are based primarily on a series of conservative assumptions related to predicted environmental concentrations, exposure, and chemical toxicity. The use of conservative assumptions tends to produce upper-bound estimates of risk. BAAQMD acknowledges this uncertainty by stating: "the methods used [to estimate risk] are conservative, meaning that the real risks from the source may be lower than the calculations, but it is unlikely that they will be higher." The USEPA notes that the conservative assumptions used in a HRA are intended to assure that the estimated risks do not underestimate the actual risks posed by a site and that the estimated risks do not necessarily represent actual risks experienced by populations at or near a site.[6]

HAZARDS IDENTIFICATION

California Air Resources Board (CARB) has developed a list of TAC, where a TAC is "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health (California Health and Safety Code Section 39655). All USEPA hazardous air pollutants are TAC. CARB administers the Air Toxics "Hot Spots" program under Assembly Bill 2588 "Hot Spots" Information and Assessment Act, which requires periodic local review of facilities which emit TAC. Local air agencies periodically must prioritize stationary sources of TAC and prepare health risk assessments for high-priority sources.

Diesel exhaust is a complex mixture of numerous individual gaseous and particulate compounds emitted from diesel-fueled combustion engines. Diesel particulate matter is formed primarily through the incomplete combustion of diesel fuel. DPM is removed from the atmosphere through physical processes including atmospheric fall-out and washout by rain. Humans can be exposed to airborne DPM by deposition on water, soil, and vegetation; although the main pathway of exposure is inhalation. Cal/EPA has concluded that potential cancer risk from inhalation exposure to whole diesel exhaust outweigh the multi-pathway cancer risk from the speciated components.

In August 1998, the CARB identified DPM as an air toxic. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel- Fueled Engines and Vehicles* and *Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines* and approved these documents on September 28, 2000.[7] [8] The documents represent proposals to reduce DPM emissions, with the goal of reducing emissions and the associated health risk by 75 percent in 2010 and by 85 percent in 2020. The program aimed to require the use of state-of-the-art catalyzed DPM filters and ultra-low-sulfur diesel fuel.

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[6] US Environmental Protection Agency, *Risk Assessment Guidance for Superfund Human Health Risk Assessment*, December 1989, https://www.epa.gov/sites/production/files/2015-09/documents/rags_a.pdf

[7] California Air Resources Board, *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles,* October 2000, http://www.arb.ca.gov/diesel/documents/rrpfinal.pdf

[8] California Air Resources Board, *Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines,* October 2000, https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/rmgfinal.pdf

In 2001, CARB assessed the state-wide health risks from exposure to diesel exhaust and to other toxic air contaminants. It is difficult to distinguish the health risks of diesel emissions from those of other air toxics, since diesel exhaust contains approximately 40 different TAC. The CARB study detected diesel exhaust by using ambient air carbon soot measurements as a surrogate for diesel emissions. The study reported that the state-wide cancer risk from exposure to diesel exhaust was about 540 per million population as compared to a total risk for exposure to all ambient air toxics of 760 per million. This estimate, which accounts for about 70 percent of the total risk from TAC, included both urban and rural areas in the state. The estimate can also be considered an average worst-case for the state, since it assumes constant exposure to outdoor concentrations of diesel exhaust and does not account for expected lower concentrations indoors, where most of time is spent. DPM is estimated to increase statewide cancer risk by 520 cancers per million residents exposed over a lifetime.[9]

Exposure to DPM results in a greater incidence of chronic non-cancer health effects, such as cough, labored breathing, chest tightness, wheezing, and bronchitis. Individuals particularly vulnerable to DPM are children, whose lung tissue is still developing, the elderly and people with illnesses who may have other serious health problems that can be aggravated by exposure to DPM. In general, children are more vulnerable than adults to air pollutants because they have higher inhalation rates, narrower airways, and less mature immune systems. In addition, children with allergies may have an enhanced allergic response when exposed to diesel exhaust).

CARB has been working to develop, implement, and enforce regulations and programs to reduce DPM emissions and associated health risks. As a result, the California Emissions Projection Analysis Model data shows a 77 percent DPM emission reduction in 2020 and projects an 86 percent DPM emission reduction in 2030 compared to 2000 DPM emissions. As a reference, the South Coast Air Quality Management District (SCAQMD) Multiple Air Toxics Exposure Study (MATES)-V cites a 86 percent DPM reduction based on surrogate monitoring data between MATES II (1998) and MATES V (2018), which starts later and ends earlier than the 1990 to 2020 timeframe from CARB with an 85 percent reduction target.

In 2005, the SCAQMD conducted a comprehensive study on air toxics in the South Coast Air Basin (Los Angles Area) or SCAB called the MATES-III. The monitoring program measured more than 30 air pollutants, including both gas and particulates. The monitoring study was accompanied by a computer modeling study in which SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. MATES-III found that the average cancer risk in the region from carcinogenic air pollutants ranges from approximately 870 in a million to 1,400 in a million, with an average regional risk of approximately 1,200 in a million.[10]

In 2015, the MATES IV followed up to previous air toxics studies in the SCAB. The MATES IV Study includes an updated emissions inventory of toxic air contaminants and a modeling effort to characterize risk across the SCAB. The study focuses on the carcinogenic risk from exposure to air toxics but does not

[9] California Air Resources Board, *Summary: Diesel Particulate Matter Health Impacts*, April 12, 2016, https://www.arb.ca.gov/research/diesel/diesel-health_summ.htm

[10] South Coast Air Quality Management District, Multiple Air Toxics Exposure Study (MATES-III) in the South Coast Air Basin, September 2008, https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iii

estimate mortality or other health effects from particulate exposures. An additional focus of MATES IV is the inclusion of measurements of ultrafine particle concentrations. Results for MATES-IV show that trends in monitored levels air toxics continue to decline, modeled exposures and risks were substantially lower compared to MATES III (approximately 60 percent decrease), and DPM remains the largest component of air toxics estimated risk, at approximately 68 percent of the South Coast Air Basin wide cancer risk of 418 per million persons, ranging from 320 to 480 per million persons.[11]

In August of 2021, the Multiple Air Toxics Exposure Study V (MATES V)[12] was released. MATES V focuses on measurements during 2018 and 2019 with a comprehensive modeling analysis and emissions inventory based on 2018 data. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V. First, MATES V estimates cancer risks by considering multiple exposure pathways, which includes inhalation and non-inhalation pathways. Previous MATES studies quantified the cancer risks based on the inhalation pathway only. Second, along with cancer risk estimates, MATES V includes information on the chronic non-cancer risks from inhalation and non-inhalation pathways for the first time. As in previous MATES iterations, DPM is the largest contributor to overall air toxics cancer risk. However, the average levels of DPM in MATES V are 50 percent lower at the ten monitoring sites compared to MATES IV and 86 percent lower since MATES II based on monitored data.[13] It is expected that the Bay Area Air Basin would experience similar reductions in health risk due to air toxics. In addition to DPM, the proposed project would emit other air toxics via the cooling tower and scrubber.

EXPOSURE ASSESSMENT

Dispersion is the process by which atmospheric pollutants disseminate due to wind and vertical stability. The results of a dispersion analysis are used to assess pollutant concentrations at or near an emission source. The results of an analysis allow predicted concentrations of pollutants to be compared directly to air quality standards and other criteria such as health risks based on modeled concentrations.

A rising pollutant plume reacts with the environment in several ways before it levels off. First, the plume's own turbulence interacts with atmospheric turbulence to entrain ambient air. This mixing process reduces and eventually eliminates the density and momentum differences that cause the plume to rise. Second, wind transports the plume during its rise and entrainment process. Higher winds mix the plume more rapidly, resulting in a lower final rise. Third, the plume interacts with the vertical temperature stratification of the atmosphere, rising as a result of buoyancy in the unstable-to-neutrally stratified mixed layer. However, after the plume encounters the mixing lid and the stably stratified air above, its vertical motion is dampened.

[11] South Coast Air Quality Management District, Multiple Air Toxics Exposure Study (MATES-IV) in the South Coast Air Basin, May 1, 2015, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iv

[12] South Coast Air Quality Management District, Multiple Air Toxics Exposure Study (MATES-V) in the South Coast Air Basin, August 2021, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v

[13] South Coast Air Quality Management District, Multiple Air Toxics Exposure Study (MATES-V) in the South Coast Air Basin, August 2021, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v

Molecules of gas or small particles injected into the atmosphere will separate from each other as they are acted on by turbulent eddies. The Gaussian mathematical model such as AERMOD simulates the dispersion of the gas or particles within the atmosphere. The formulation of the Gaussian model is based on the following assumptions:

- The predictions are not time-dependent (all conditions remain unchanged with time)
- The wind speed and direction are uniform, both horizontally and vertically, throughout the region of concern
- The rate of diffusion is not a function of position
- Diffusion in the direction of the transporting wind is negligible when compared to the transport flow

Dispersion Modeling Approach

Air dispersion modeling was performed to estimate the downwind dispersion of DPM exhaust emissions resulting from construction activities. The following sections present the fundamental components of an air dispersion modeling analysis including air dispersion model selection and options, receptor locations, meteorological data, and source exhaust parameters.

Model Selection and Options

AERMOD (Version 24142)[14] [15] was used for the dispersion analysis. AERMOD is the USEPA preferred atmospheric dispersion modeling system for general industrial sources. The model can simulate point, area, volume, and line sources. AERMOD is the appropriate model for this analysis based on the coverage of simple, intermediate, and complex terrain. It also predicts both short-term and long-term (annual) average concentrations. The model was executed using the regulatory default options (stack-tip downwash, buoyancy-induced dispersion, and final plume rise), default wind speed profile categories, default potential temperature gradients, and assuming no pollutant decay.

The selection of the appropriate dispersion coefficients depends on the land use within three kilometers (km) of the project site. The types of land use were based on the classification method defined by Auer (1978); using pertinent United States Geological Survey (USGS) 1:24,000 scale (7.5 minute) topographic maps of the area. If the Auer land use types of heavy industrial, light-to-moderate industrial, commercial, and compact residential account for 50 percent or more of the total area, the USEPA *Guideline on Air Quality Models*[16] recommends using urban dispersion coefficients; otherwise, the appropriate rural coefficients can be used. Based on observation of the area surrounding the project site, rural dispersion coefficients were applied within AERMOD (urban is only designated within dense city centers such as downtown San Francisco).

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[14] The HRA for the MND used AERMOD (Version 23132). However, since the HRA was completed and the public comment period, AERMOD (Version 24142) has been made available.

[15] US Environmental Protection Agency, AERMOD Modeling System, https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models

[16] US Environmental Protection Agency, *Guideline on Air Quality Models (Revised), 40 Code of Federal Regulations, Part 51, Appendix W,* November 2005.

Receptor Locations

Some receptors are considered more sensitive to air pollutants than others, because of preexisting health problems, proximity to the emissions source, or duration of exposure to air pollutants. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential areas are also considered sensitive to poor air quality because people in residential areas are often at home for extended periods. Recreational land users are moderately sensitive to air pollution because vigorous exercise associated with recreation places having a high demand on respiratory system function.

Modeling locations were placed at offsite worker receptors to estimate health impacts due to proposed project construction and operations. Numerous offsite workers are located within 1,000 feet of the project site. Modeling locations were placed at nearby buildings in which offsite workers would gather, along the facility property line, and within a cartesian grid with spacing of 50 meters from the proposed project. This results in approximately 270 modeling receptors.

Martin Luther King Junior High School is located approximately 1.2 miles to the southwest of the project site. Turner Elementary School is located approximately 1.6 miles to the south of the project site. Antioch Charter Academy is located approximately 2.0 miles to the southeast of the project site. Maria Vista Elementary School is located approximately 1.8 miles to the west of the project site. Little People's Preschool is located approximately 1.1 miles to the southwest of the project site. Modeling receptors were also included for these educational facilities.

The nearest residential land uses (in the area bordered by the Pittsburg-Antioch Highway, Central Addition Park, Manor Street, and the railroad tracks) are located approximately 1.0 miles to the southwest of the project site. There are also residences located to the south of the project site (in an area bordered by California Delta Highway and Leland Street), within approximately 1.2 miles and residences located to the southeast of the project site (in an area bordered by Auto Center Drive, 16th Street, and Crestview Drive), within approximately 1.7 miles. Modeling receptors were also included for these residential land uses.

Figure A-1 displays the location of the offsite worker receptors used in this HRA within 1,000 feet of the project site. Receptors were placed at a height of 1.8 meters (typical breathing height). Terrain elevations for receptor locations were used based on available USGS information for the area.

Figure A-1
Health Risk Assessment Receptors



Meteorological Data

There are two meteorological stations located near the project site. Concord Buchanan Field is located approximately 11.6 miles to the southwest of the project site. The Dow Chemical monitoring station is located approximately 0.5 miles to the southeast of the project site.[17]

For Concord Buchanan Field, meteorological data from 2013 through 2017 were used. **Figure A-2** displays the annual wind rose. Wind directions are predominantly from the south with a moderate frequency of calm wind speed conditions (6 percent), as shown in **Figure A-3**. The average annual wind speed is 7.8 miles per hour (3.5 meters per second).

The Dow meteorological station also has data from 2013 through 2017. **Figure A-4** displays the annual windrose. Wind directions are predominantly from the west with a low frequency of calm wind speed conditions (1.5 percent), as shown in **Figure A-5**. The average annual wind speed is 8.1 miles per hour (3.6 meters per second). During the completion of the HRA and the public comment period for the MND, the Dow meteorological data available from BAAQMD was missing information from June 15 through December 31 of 2016.[18] The Dow meteorological data did not meet the USEPA requirement of 90 percent data capture,[19] [20] and was not acceptable to use in the dispersion modeling analysis (regardless of whether the monitoring station is more representative of the project site) and thus was not used for the HRA. However, in February of 2025, the BAAQMD updated the Dow meteorological data to address the missing information and thus the updated HRA used the Dow meteorological data and provided a comparison with the HRA results using the Concord Buchanan Field meteorological data.

Source Release Characteristics

Construction equipment activities were treated as an area source. The release height of the off-road equipment exhaust was 3.05 meters and an initial vertical dimension of 4.15 meters, which reflects the height of the equipment plus an additional height of the exhaust plume above the exhaust point to account for plume rise due to buoyancy and momentum. Fugitive dust-generating activities were treated as an area source. The release height of the fugitive dust was 0.0 meters and an initial vertical dimension of 1.0 meters. Haul trucks were treated as a line source (i.e., volume sources placed at regular intervals) located along an access road. The haul trucks were assigned a release height of 3.05 meters and an initial vertical dimension of 4.15 meters, which accounts for dispersion from the

[17] Bay Area Air Quality Management District, AERMOD-ready Meteorological Data, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/ceqa-modeling-data

[18] Bay Area Air Quality Management District, AERMOD-ready Meteorological Data, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/ceqa-modeling-data

[19] US Environmental Protection Agency, *Guideline on Air Quality Models (Revised), 40 Code of Federal Regulations, Part 51, Appendix W,* November 2005

[20] US Environmental Protection Agency, Meteorological Monitoring Guidance for Regulatory Modeling Applications, February 2000, https://www.epa.gov/sites/default/files/2020-10/documents/mmgrma_0.pdf

movement of vehicles.[21] Typically, construction activities would occur between 8 a.m. and 5 p.m. (eight hours per day), Monday through Friday. Terrain elevations for emission source locations were used based on available USGS information for the area. AERMAP (Version 18081)[22] was used to develop the terrain elevations.

Figure A-2

Windrose for Concord Buchanan Field

[21] While haul truck emissions contribute substantially to overall project emissions, they are spread over many miles. Hence, the portion of trucking emissions that would impact one receptor is much smaller than the emissions that the clustered off-road activity at the project site would impact a receptor near the site. For example, the DPM emissions from truck travel within 1,000 feet of the project are less than one percent of the total off-road DPM emissions.

[22] US Environmental Protection Agency, AERMAP, https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models

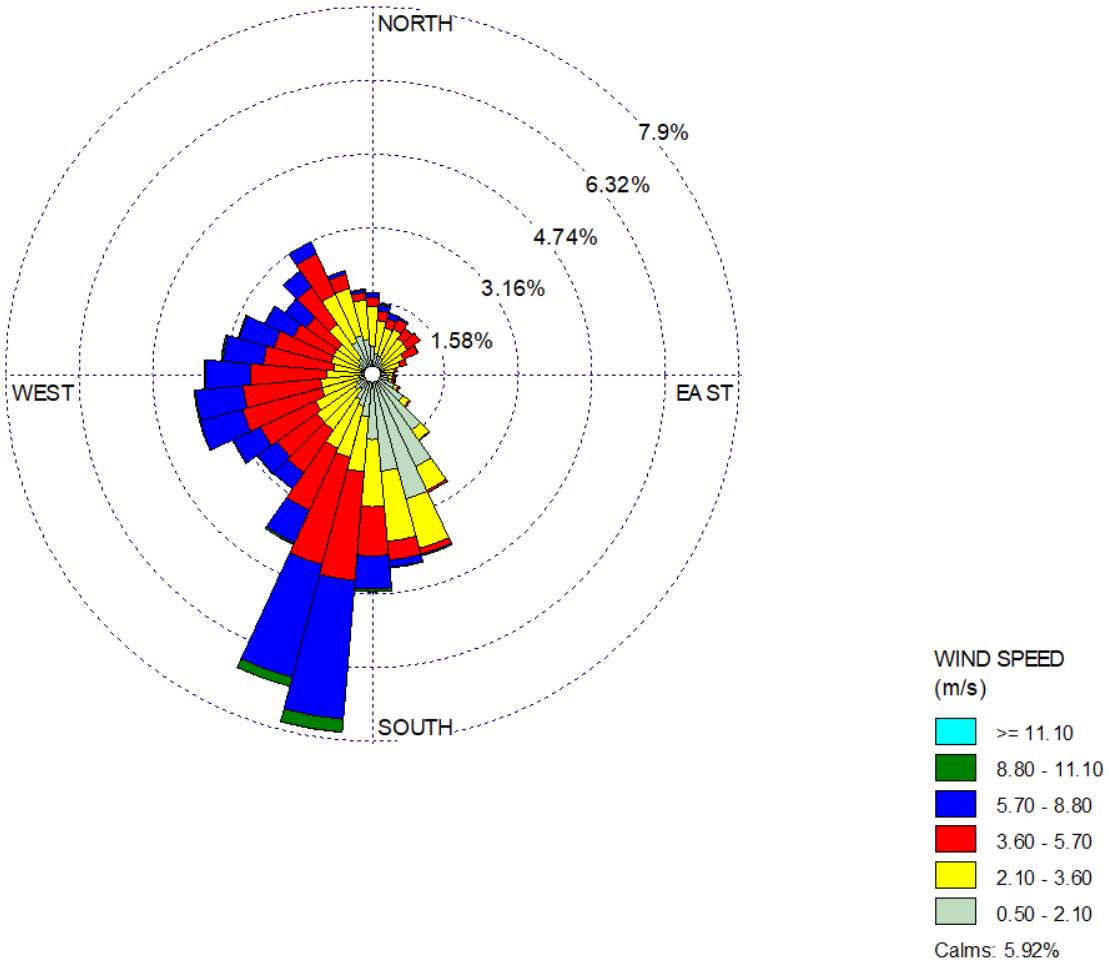

NORTH
7.9%
6.32%
4.74%
3.16%
1.58%
WEST
EAST
SOUTH
WIND SPEED
(m/s)
>= 11.10
8.80 - 11.10
5.70 - 8.80
3.60 - 5.70
2.10 - 3.60
0.50 - 2.10
Calms: 5.92%

Figure A-3
Windrose for Dow Chemical

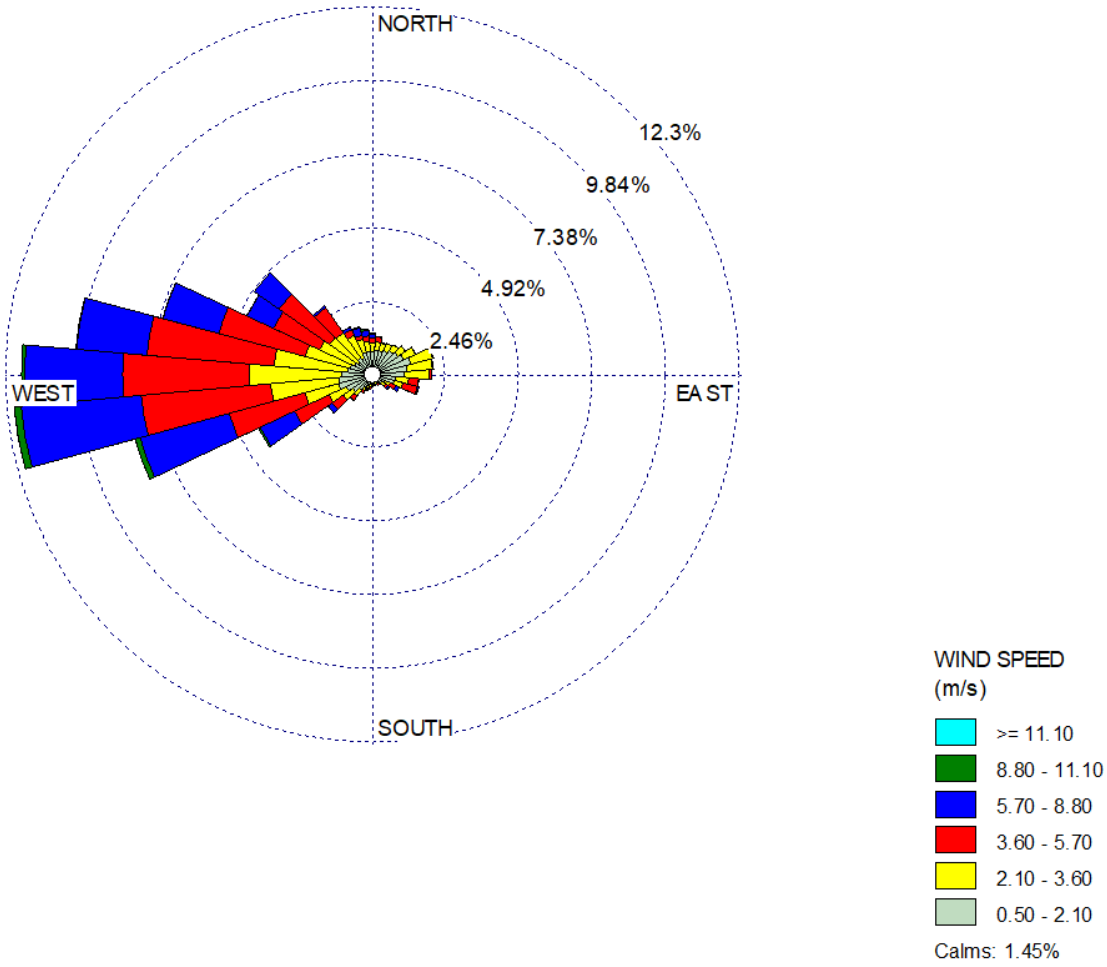


Figure A-4
Wind Speed Distribution for Concord Buchanan Field

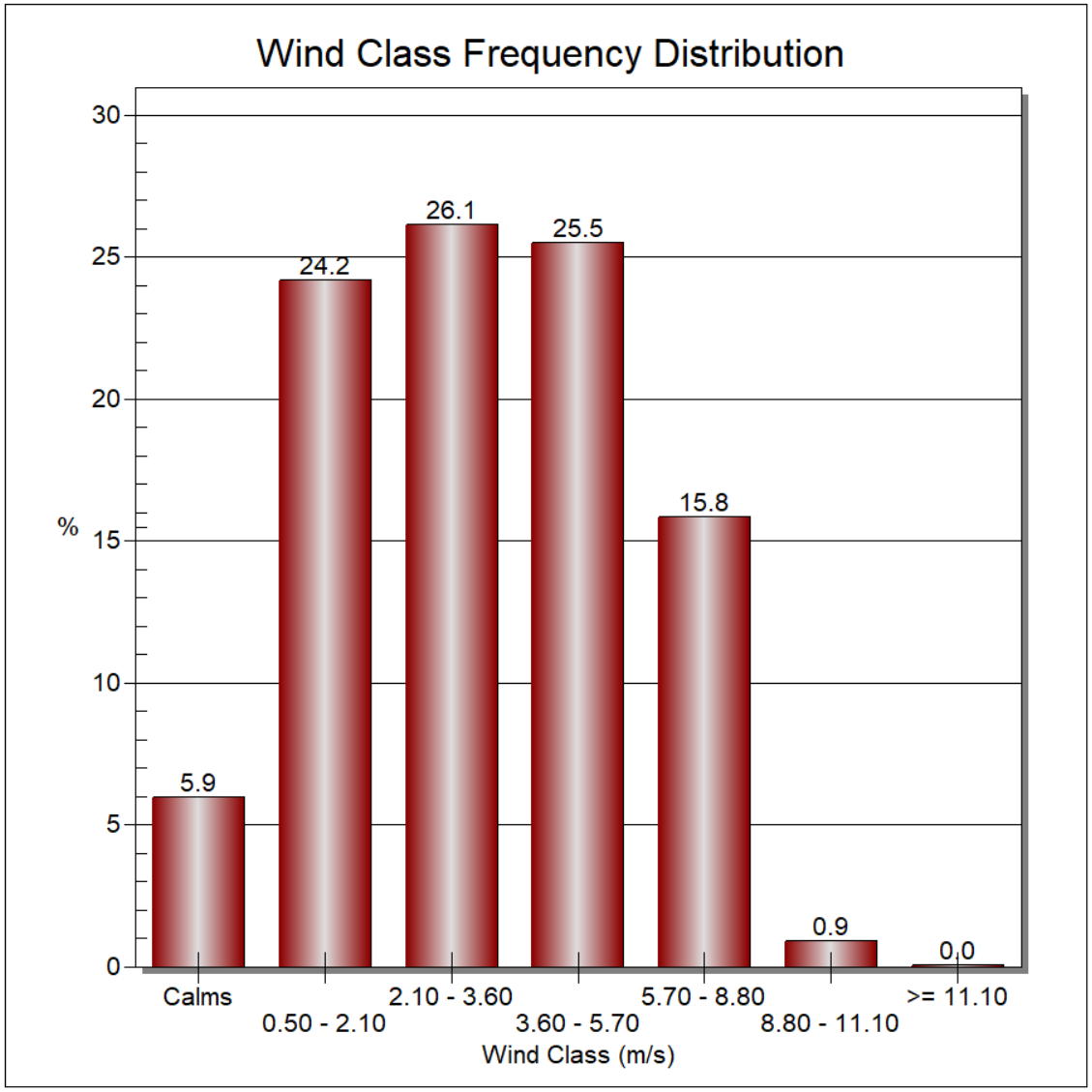
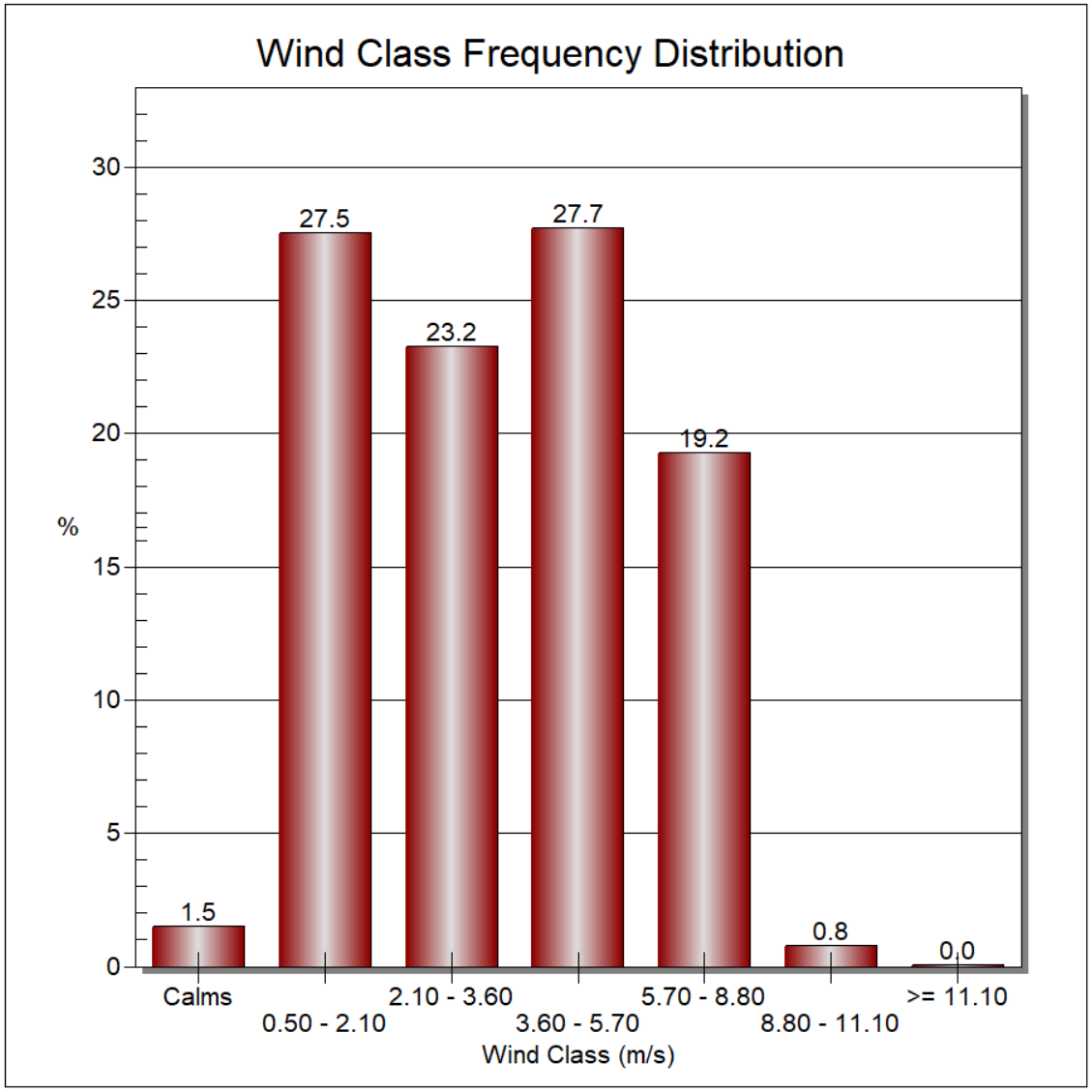


Figure A-5
Wind Speed Distribution for Dow Chemical



Operational off-road equipment activities were treated as an area source. The release height of the off-road equipment exhaust was 5.0 meters and an initial vertical dimension of 1.4 meters, which reflects the height of the equipment plus an additional height of the exhaust plume above the exhaust point to account for plume rise due to buoyancy and momentum. Operational haul trucks were treated as a line source (i.e., volume sources placed at regular intervals) located along an access road. The haul trucks were assigned a release height of 5.0 meters and an initial vertical dimension of 1.4 meters, which accounts for dispersion from the movement of vehicles.

A cooling tower is associated with piping and heat exchangers to remove the heat from the compressors. The cooling tower was treated as a point source with a release height of 3.20 meters, an exhaust temperature of 95 Fahrenheit, an exhaust velocity of 11.3 meters per second (or 266,896 cubic feet per minute), and a diameter of 3.77 meters. The cooling tower would operate five days per week and 24 hours per day.

The scrubbers were treated as point sources with a release height of 6.10 meters, an exhaust temperature of 140 Fahrenheit, an exhaust velocity of 11.6 meters per second (or 12,690 cubic feet per minute), and a diameter of 0.81 meters. Two scrubber columns will be used with one effluent stack. Scrubbing will occur in two stages with gases to be scrubbed flowing through each column in series and finally exiting through the stack. The facility and scrubbers would not operate without the use of stage 1 and stage 2 conditions. The scrubbers would operate 365 days per year and 24 hours per day.

Source Emission Rates

The cooling tower would emit volatile organic compounds (VOC) as reactive organic gases (ROG), particulate matter less than 10 micrometers (coarse particulate or PM_{10}), and chloroform. The PM_{10} emissions are the result of the total dissolved solids in the circulating water which are carried out with the water that is entrained in the air being discharged from the tower. VOC emissions typically result from the leakage from process heat exchangers that service hydrocarbon (HC) process streams as well as from chemical treatment with VOC containing material added to the circulating water. VOC emissions are expected from cooling towers used in refineries and chemical plants, where the circulating water is used to cool down the process stream. Chloroform, an air toxic, emissions are typically from the toxic constituents of PM_{10} and/or VOC in the circulating water. USEPA AP-42, Compilation of Air Pollutant Emission Factors (VOC - AP-42, Section 5.1, Table 5.1-2 PM_{10} - AP-42, Section 13.4, Table 13.4-1) was used to estimate the VOC, PM_{10}, and chloroform emission rates. AP-42 is the primary compilation of USEPA's emission factor information. It contains emission factors and process information for more than 200 air pollution source categories. A source category is a specific industry sector or group of similar emitting sources. The emission factors have been developed and compiled from source test data, material balance studies, and engineering estimates.[23] [24]

[23] US Environmental Protection Agency, AP 42, Compilation of Air Pollutant Emission Factors, Fifth Edition, Volume I, https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors

[24] South Coast Air Quality Management District, Guidelines for Calculating Emissions from Cooling Towers, December 2022, https://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/guidelines-for-calculating-emissions-from-cooling-towers-2022.pdf?sfvrsn=6

The cooling tower would have an estimated average recirculation flow rate of 737 gallons per minute. Peak hour is conservatively estimated at 1.5 average recirculation rate which results in peak hourly recirculation flow rate of 1,106 gallons per minute. The annual throughput is 275,932,800 gallons. The VOC, PM_{10}, and chloroform emission factors are 0.7, 19, and 0.018 pounds per throughput gallon. This results in 0.00119 pounds of chloroform per hour and 4.97 pounds of chloroform per year.

The scrubber would emit hydrogen chloride (HCL). **Equation 1** represents the formula to convert a scrubber exhaust measurement (in parts per billion) to hourly and annual emission rate. The HCl emissions from the scrubber were estimated using the data provided by the vendor. According to the vendor information, the HCl will be treated by a 2-stage system. The uncontrolled inlet HCl concentration is 20 ppm for the design. At the outlet of the stage 1 scrubber, the HCl concentration would be 0.6 ppm. At the outlet of the stage 2 scrubber, the HCl concentration would be 0.00006 ppm at a flow rate of 12,690 cubic feet per minute (at temperature at 140 F, pressure 28.82 inches of Hg).

The uncontrolled HCL emissions would be 1.42 pounds per hour and 12, 418 pounds per year. The stage 1 HCL emissions (with 97 percent control efficiency) would be 0.04 pounds per hour and 373 pounds per year. The HCl emissions from the Stage 2 outlet (with 99.9 percent control efficiency) would be 0.0000044 pounds per hour 0.038 pounds per year. For permitting purposes, the scrubber emissions would not trigger an HRA per BAAQMD Rule 2-5.

Equation 1

*Emission Rate (pounds/hour) = Sample Measurement (ppb) * Molecular Weight * 0.0409 * Stack Gas Exhaust Flow Rate (m^3/hour) * 10^6/453.6 gram/pound*

Building Downwash

Building downwash is the influence building structures have on the wind flow and thus the emissions from point sources such as cooling tower and scrubber stack. The AERMOD required input of building heights and building widths for 36 wind directions. The USEPA Building Profile Input Program was used to determine the direction-specific building dimensions. Building downwash algorithms incorporated into AERMOD account for the plume dispersion effects of the aerodynamic wakes and eddies produced by buildings and structures. The Plume Rise Model Enhancements (PRIME) model was used to determine the direction-specific building downwash parameters. PRIME calculates fields of turbulence intensity, wind speed, and slopes of the mean streamlines as a function of building shape. Using a numerical plume rise model, PRIME determines the change in plume centerline location and the rate of plume dispersion with downwind distance. Concentrations are predicted in both the near and far wake regions, with the plume mass captured by the near wake treated separately from the uncaptured primary plume and re-emitted to the far wake as a volume source. The facility buildings are approximately 10.7 meters in height.

EXPOSURE PARAMETERS

This HRA was conducted following methodologies in OEHHA's *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*.[25] This was accomplished by applying the estimated concentrations at the receptors analyzed to the established cancer risk estimates and acceptable reference concentrations for non-cancer health effects.

OEHHA's revisions to its *Guidance Manual* were primarily designed to ensure that the greater sensitivity of children to cancer and other health risks is reflected in HRAs. For example, OEHHA now recommends that risks be analyzed separately for multiple age groups, focusing especially on young children and teenagers, rather than the past practice of analyzing risks to the general population, without distinction by age. OEHHA also now recommends that statistical "age sensitivity factors" be incorporated into a HRA, and that children's relatively high breathing rates be accounted for. On the other hand, the *Guidance Manual* revisions also include some changes that would reduce calculated health risks. For example, under the former guidance, OEHHA recommended that residential cancer risks be assessed by assuming 70 years of exposure at a residential receptor; under the *Guidance Manual*, this assumption is lessened to 30 years.

OEHHA has developed exposure factors (e.g., daily breathing rates) for six age groups including the last trimester to birth, birth to 2 years, 2 to 9 years, 2 to 16 years, 16 to 30 years, and 16 to 70 years. These age bins allow for more refined exposure information to be used when estimating exposure and the potential for developing cancer over a lifetime. This means that exposure variates are needed for the third trimester, ages zero to less than two, ages two to less than nine, ages two to less than 16, ages 16 to less than 30, and ages 16 to 70. Residential receptors utilize the 95th percentile breathing rate values. The breathing rates are age-specific and are 1,090 liters per kilogram-day for ages less than 2 years, 745 liters per kilogram-day for ages 2 to 16 years, 335 liters per kilogram-day for ages 16 to 30 years, and 290 liters per kilogram-day for ages 30 to 70 years. A school child's breathing rate is 520 liters per kilogram-day and an off-site worker's breathing rate is 230 liters per kilogram-day.

OEHHA developed age sensitivity factors (ASF) to take into account the increased sensitivity to carcinogens during early-in-life exposures. OEHHA recommends that cancer risks be weighted by a factor of 10 for exposures that occur from the third trimester of pregnancy to 2 years of age, and by a factor of 3 for exposures from 2 years through 15 years of age.

Based on OEHHA recommendations, the cancer risk to residential receptors assumes exposure occurs 24 hours per day for 350 days per year while accounting for a percentage of time at home. OEHHA evaluated information from activity pattern databases to estimate the fraction of time at home (FAH) during the day. This information was used to adjust exposure duration and cancer risk based on the assumption that a person is not present at home continuously for 24 hours and therefore exposure to emissions is not occurring when a person is away from their home. In general, the FAH factors are age-specific and are 0.85 for ages less than 2 years, 0.72 for ages 2 to 16 years, and 0.73 for ages 30 to 70 years.

[25] Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

OEHHA has decreased the exposure duration currently being used for estimating cancer risk at the maximum exposed individual resident from 70 to 30 years. This is based on studies showing that 30 years is a reasonable estimate of the 90th to 95th percentile of residency duration in the population. Additionally, OEHHA recommends using the 9 and 70-year exposure duration to represent the potential impacts over the range of residency periods.

Given the exposure durations of less than 24 hours, sensitive recreational receptors were evaluated for acute impacts only. Based on OEHHA recommendations, for children at school sites, exposure is assumed to occur 10 hours per day for 180 days (or 36 weeks) per year. Cancer risk estimates for children at school sites are calculated based on 9-year exposure duration. School sites also include teachers and other adult staff which are treated as off-site workers.

For occupational receptors, OEHHA guidance suggests that the exposure be based on 8 hours per day, 5 days per week, 50 weeks per year, 250 working days per year, and a 25-year working lifetime. This is a conservative assumption since most people do not remain at the same job for 25 years. For offsite worker exposures, it is assumed that the working age begins at 16 years, and that exposures to project emissions occur during the work shift which is typically up to eight hours per day during workdays.[26]

Table A-2 presents a summary of the health risk assessment exposure factors.

Table A-2
Health Risk Assessment Exposure Factors

Receptor	Age	Age Specific Factor	Breathing Rate (L/kg-day)	Fraction of Time	Daily Exposure	Annual Exposure
Offsite Worker	16 to 41	1	230	1	8 hours	250 days
Residential	Third Trimester	10	361	0.85	24 hours	350 days
	0 to 2	10	1,090	0.85	24 hours	350 days
	2 to 16	3	745	0.72	24 hours	350 days
	16 to 30	1	261	0.73	24 hours	350 days
School Child	2 to 16	3	581	1	10 hours	180 days

Source: Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

RISK CHARACTERIZATION

Cancer risk is defined as the lifetime probability of developing cancer from exposure to carcinogenic substances. Cancer risks are expressed as the chance in one million of getting cancer (i.e., number of cancer cases among one million people exposed). The cancer risks are assumed to occur exclusively through the inhalation pathway. The cancer risk can be estimated by using the cancer potency factor (milligrams per kilogram of body weight per day [mg/kg-day]), the 30-year annual average concentration (microgram per cubic meter [µg/m^3]), and the lifetime exposure adjustment.

Following guidelines established by OEHHA, the incremental cancer risks attributable to the proposed project were calculated by applying exposure parameters to modeled DPM concentrations in order to

[26] Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

determine the inhalation dose (mg/kg-day) or the amount of pollutants inhaled per body weight mass per day. The cancer risks occur exclusively through the inhalation pathway; therefore, the cancer risks can be estimated from the following equation:

$$\text{Dose-inh} = \frac{C_{air} * \{DBR\} * A * ASF * FAH * EF * ED * 10^{-6}}{AT}$$

where:

Dose-inh	= Dose of the toxic substance through inhalation in mg/kg-day
10^{-6}	= Micrograms to milligrams conversion, Liters to cubic meters conversion
C_{air}	= Concentration in air in microgram (µg)/cubic meter (m^3)
{DBR}	= Daily breathing rate in liter (L)/kg body weight – day
A	= Inhalation absorption factor, 1.0
ASF	= Age Sensitivity Factor
EF	= Exposure frequency (days/year)
ED	= Exposure duration (years)
FAH	= Fraction of Time at Home
AT	= Averaging time period over which exposure is averaged in days (25,550 days for a 70-year cancer risk)

To determine incremental cancer risk, the estimated inhalation dose attributed to the proposed project was multiplied by the cancer potency slope factor (cancer risk per mg/kg-day). The cancer potency slope factor is the upper bound on the increased cancer risk from a lifetime exposure to a pollutant. These slope factors are based on epidemiological studies and are different values for different pollutants. This allows the estimated inhalation dose to be equated to a cancer risk.

Non-cancer adverse health impacts, acute (short-term) and chronic (long-term), are measured against a hazard index (HI), which is defined as the ratio of the predicted incremental exposure concentration from the proposed project to a published reference exposure level (REL) that could cause adverse health effects as established by OEHHA. The ratio (referred to as the Hazard Quotient [HQ]) of each non-carcinogenic substance that affects a certain organ system is added to produce an overall HI for that organ system. The overall HI is calculated as the total for each organ system. If the overall HI for the highest-impacted organ system is greater than one, then the impact is considered to be significant.

The HI is an expression used for the potential for non-cancer health effects. The relationship for the non-cancer health effects is given by the annual concentration (in µg/m^3) and the REL (in µg/m^3). The acute hazard index was determined using the "simple" concurrent maximum approach, which tends to be conservative (i.e., overpredicts). The chronic REL for DPM was established by the California OEHHA as 5 µg/m^3.[27] There is no acute REL for DPM.

The relationship for the non-cancer health effects is given by the following equation:

[27] Office of Environmental Health Hazards Assessment - Acute, 8-hour, and Chronic Reference Exposure Levels, October 11, 2023, http://www.oehha.ca.gov/air/allrels.html

$$HI = C/REL$$

Where:

HI = Hazard index; an expression of the potential for non-cancer health effects.

C = Annual average concentration ($\mu g/m^3$) during the 70-year exposure period.

REL = Concentration at which no adverse health effects are anticipated.

The concentration level at or below which no adverse non-cancer health effects are anticipated for a specified exposure duration is termed the REL. REL are based on the most sensitive, relevant, adverse health effect reported in the medical and toxicological literature. REL are designed to protect the most sensitive individuals in the population by the inclusion of margins of safety. Since margins of safety are incorporated to address data gaps and uncertainties, exceeding the REL does not automatically indicate an adverse health impact.[28] The chronic REL for DPM was established by the California OEHHA as 5 $\mu g/m^3$.[29]

Table A-3 displays the toxicity values for the pollutants of concern associated with the proposed project operation (as in diesel particulate matter and other air toxics). The cooling tower and scrubber operations would emit air toxics such as chloroform and hydrogen chloride, respectively.

Table A-3
Health Risk Assessment Toxicity Values

Compound	Inhalation Slope Factor $(mg/kg\text{-}day)^{-1}$	Acute REL ($\mu g/m^3$)	Chronic REL ($\mu g/m^3$)
DPM	1.1	-	5
Chloroform	-	150	300
Hydrogen Chloride	-	2,100	9

Source: Office of Environmental Health Hazards Assessment - – *Chemical Database,* https://oehha.ca.gov/chemicals

A brief description of the air toxics of concern is provided within the following:

Chloroform

Chloroform is a colorless liquid with a pleasant, nonirritating odor and a slightly sweet taste. It will burn only when it reaches very high temperatures. In the past, chloroform was used as an inhaled anesthetic during surgery, but it isn't used that way today. Today, chloroform is used to make other chemicals and can also be formed in small amounts when chlorine is added to water. Other names for chloroform are trichloromethane and methyl trichloride [30]

[28] Office of Environmental Health Hazards Assessment - Consolidated Health Values Table, December 9, 2022, https://www.arb.ca.gov/toxics/healthval/contable.pdf

[29] Office of Environmental Health Hazards Assessment - Acute, 8-hour, and Chronic Reference Exposure Levels, October 11, 2023, http://www.oehha.ca.gov/air/allrels.html

[30] Agency for Toxic Substance and Disease Registry ToxFAQ for Chloroform, https://www.atsdr.cdc.gov/substances/indexAZ.asp

Hydrogen Chloride

At room temperature, hydrogen chloride is a colorless to slightly yellow, corrosive, nonflammable gas that is heavier than air and has a strong irritating odor. On exposure to air, hydrogen chloride forms dense white corrosive vapors. Hydrogen chloride has many uses, including cleaning, pickling, electroplating metals, tanning leather, and refining and producing a wide variety of products. Hydrogen chloride can be formed during the burning of many plastics. Upon contact with water, it forms hydrochloric acid. Both hydrogen chloride and hydrochloric acid are corrosive.[31]

[31] Agency for Toxic Substance and Disease Registry ToxFAQ for Hydrogen Chloride, https://www.atsdr.cdc.gov/substances/indexAZ.asp

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Unmitigated Construction
Receptor:	Existing Residence
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		5.28E-04	9.90E-04	361	10.0	0.85	0.02
1	2025	5.28E-04	9.90E-04	1,090	10.0	0.85	0.07
2	2026	3.83E-04	3.89E-04	1,090	10.0	0.85	0.05
3	2027			745	3.00	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.15	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.01	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Mitigated Construction
Receptor:	Existing Residence
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		6.11E-05	2.55E-04	361	10.0	0.85	0.00
1	2025	6.11E-05	2.55E-04	1,090	10.0	0.85	0.01
2	2026	5.91E-05	6.01E-04	1,090	10.0	0.85	0.01
3	2027			745	3.00	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.02	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.00	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Unmitigated Construction
Receptor:	Existing School
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	4.33E-04	8.08E-04	581	3.00	1.00	0.01
2	2026	3.14E-04	3.18E-04	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.01	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Mitigated Construction
Receptor:	Existing School
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	5.02E-05	2.09E-04	581	3.00	1.00	0.00
2	2026	4.85E-05	4.91E-05	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.00	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Unmitigated Construction
Receptor:	Offsite Worker
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	4.30E-01	7.99E-01	230	1.00	1.00	1.06
2	2026	3.11E-01	3.14E-01	230	1.00	1.00	0.77
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.80	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
Yes	Significant?
0.09	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
1.83	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Mitigated Construction
Receptor:	Offsite Worker
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	4.97E-02	2.06E-01	230	1.00	1.00	0.12
2	2026	4.81E-02	4.85E-02	230	1.00	1.00	0.12
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.21	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.24	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Construction Trips
Receptor:	Existing Residence
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		1.13E-04	8.90E-04	381	10.0	0.85	0.01
1	2025	1.13E-04	8.90E-04	1,090	10.0	0.85	0.02
2	2026	7.86E-05	6.51E-04	1,090	10.0	0.85	0.01
3	2027			745	3.00	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.03	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.00	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Construction Trips
Receptor:	Existing School
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	9.29E-05	7.33E-04	581	3.00	1.00	0.00
2	2026	6.48E-05	5.36E-04	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.00	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Construction Trips
Receptor:	Offsite Worker
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	2.59E-02	2.04E-01	230	1.00	1.00	0.06
2	2026	1.80E-02	1.49E-01	230	1.00	1.00	0.04
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	
13	2037			230	1.00	1.00	
14	2038			230	1.00	1.00	
15	2039			230	1.00	1.00	
16	2040			230	1.00	1.00	
17	2041			230	1.00	1.00	
18	2042			230	1.00	1.00	
19	2043			230	1.00	1.00	
20	2044			230	1.00	1.00	
21	2045			230	1.00	1.00	
22	2046			230	1.00	1.00	
23	2047			230	1.00	1.00	
24	2048			230	1.00	1.00	
25	2049			230	1.00	1.00	
26	2050			230	1.00	1.00	
27	2051			230	1.00	1.00	
28	2052			230	1.00	1.00	
29	2053			230	1.00	1.00	
30	2054			230	1.00	1.00	

0.20	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.11	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project: Pittsburg Iron Salts Plant
Date: 3/6/2025
Condition: Unmitigated Construction Total
Receptor: Existing Residence
Meteorological: Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		6.24E-04	1.81E-03	361	10.0	0.85	0.03
1	2025	6.24E-04	1.81E-03	1,090	10.0	0.85	0.09
2	2026	4.50E-04	9.88E-04	1,090	10.0	0.85	0.06
3	2027			745	3.00	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.18	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.01	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project: Pittsburg Iron Salts Plant
Date: 3/6/2025
Condition: Mitigated Construction Total
Receptor: Existing Residence
Meteorological: Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		1.64E-04	1.08E-03	361	10.0	0.85	0.01
1	2025	1.64E-04	1.08E-03	1,090	10.0	0.85	0.02
2	2026	1.30E-04	6.84E-04	1,090	10.0	0.85	0.02
3	2027			745	3.00	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.05	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.00	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Unmitigated Construction Total
Receptor:	Existing School
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	5.14E-04	1.44E-03	581	3.00	1.00	0.01
2	2026	3.70E-04	7.84E-04	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.01	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Mitigated Construction Total
Receptor:	Existing School
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	1.33E-04	8.96E-04	581	3.00	1.00	0.00
2	2026	1.05E-04	5.74E-04	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.00	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Unmitigated Construction Total
Receptor:	Offsite Worker
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	4.33E-01	8.24E-01	230	1.00	1.00	1.07
2	2026	3.14E-01	3.32E-01	230	1.00	1.00	0.78
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.82	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
Yes	Significant?
0.09	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
1.85	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Mitigated Construction Total
Receptor:	Offsite Worker
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	5.29E-02	2.31E-01	230	1.00	1.00	0.13
2	2026	5.03E-02	1.51E-01	230	1.00	1.00	0.12
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.23	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.26	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Unmitigated Construction
Receptor:	Existing Residence
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		3.57E-03	6.65E-03	361	10.0	0.85	0.17
1	2025	3.57E-03	6.65E-03	1,090	10.0	0.85	0.50
2	2026	2.59E-03	2.62E-03	1,090	10.0	0.85	0.36
3	2027			745	3.00	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.01	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
1.03	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.06	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Mitigated Construction
Receptor:	Existing Residence
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		4.14E-04	1.72E-03	361	10.0	0.85	0.02
1	2025	4.14E-04	1.72E-03	1,090	10.0	0.85	0.06
2	2026	4.00E-04	4.04E-04	1,090	10.0	0.85	0.06
3	2027			745	3.00	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.13	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.01	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Unmitigated Construction
Receptor:	Existing School
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	2.50E-03	4.78E-03	581	3.00	1.00	0.03
2	2026	1.81E-03	1.88E-03	581	3.00	1.00	0.02
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.06	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Mitigated Construction
Receptor:	Existing School
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	2.90E-04	1.23E-03	581	3.00	1.00	0.00
2	2026	2.80E-04	2.90E-04	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.01	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Unmitigated Construction
Receptor:	Offsite Worker
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	4.68E-01	8.69E-01	230	1.00	1.00	1.16
2	2026	3.39E-01	3.42E-01	230	1.00	1.00	0.84
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.87	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
Yes	Significant?
0.09	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
2.00	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Mitigated Construction
Receptor:	Offsite Worker
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	5.42E-02	2.24E-01	230	1.00	1.00	0.13
2	2026	5.24E-02	5.28E-02	230	1.00	1.00	0.13
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.22	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.26	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Construction Trips
Receptor:	Existing Residence
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		2.61E-04	2.06E-03	361	10.0	0.85	0.01
1	2025	2.61E-04	2.06E-03	1,090	10.0	0.85	0.04
2	2026	1.82E-04	1.51E-03	1,090	10.0	0.85	0.03
3	2027			745	3.00	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.07	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.00	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Construction Trips
Receptor:	Existing School
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	4.72E-04	3.72E-03	581	3.00	1.00	0.01
2	2026	3.29E-04	2.72E-03	581	3.00	1.00	0.00
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.01	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Construction Trips
Receptor:	Offsite Worker
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	3.22E-02	2.54E-01	230	1.00	1.00	0.08
2	2026	2.24E-02	1.86E-01	230	1.00	1.00	0.06
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	
13	2037			230	1.00	1.00	
14	2038			230	1.00	1.00	
15	2039			230	1.00	1.00	
16	2040			230	1.00	1.00	
17	2041			230	1.00	1.00	
18	2042			230	1.00	1.00	
19	2043			230	1.00	1.00	
20	2044			230	1.00	1.00	
21	2045			230	1.00	1.00	
22	2046			230	1.00	1.00	
23	2047			230	1.00	1.00	
24	2048			230	1.00	1.00	
25	2049			230	1.00	1.00	
26	2050			230	1.00	1.00	
27	2051			230	1.00	1.00	
28	2052			230	1.00	1.00	
29	2053			230	1.00	1.00	
30	2054			230	1.00	1.00	

0.25	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.14	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project: Pittsburg Iron Salts Plant
Date: 3/6/2025
Condition: Unmitigated Construction Total
Receptor: Existing Residence
Meteorological: Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		3.77E-03	8.20E-03	361	10.0	0.85	0.17
1	2025	3.77E-03	8.20E-03	1,090	10.0	0.85	0.53
2	2026	2.73E-03	3.76E-03	1,090	10.0	0.85	0.38
3	2027			745	3.00	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.01	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
1.08	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.06	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Mitigated Construction Total
Receptor:	Existing Residence
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		6.15E-04	3.38E-03	361	10.0	0.85	0.03
1	2025	6.15E-04	3.38E-03	1,090	10.0	0.85	0.09
2	2026	5.41E-04	1.81E-03	1,090	10.0	0.85	0.08
3	2027			745	3.00	0.72	
4	2028			745	3.00	0.72	
5	2029			745	3.00	0.72	
6	2030			745	3.00	0.72	
7	2031			745	3.00	0.72	
8	2032			745	3.00	0.72	
9	2033			745	3.00	0.72	
10	2034			745	3.00	0.72	
11	2035			745	3.00	0.72	
12	2036			745	3.00	0.72	
13	2037			745	3.00	0.72	
14	2038			745	3.00	0.72	
15	2039			745	3.00	0.72	
16	2040			745	3.00	0.72	
17	2041			335	1.70	0.73	
18	2042			335	1.00	0.73	
19	2043			335	1.00	0.73	
20	2044			335	1.00	0.73	
21	2045			335	1.00	0.73	
22	2046			335	1.00	0.73	
23	2047			335	1.00	0.73	
24	2048			335	1.00	0.73	
25	2049			335	1.00	0.73	
26	2050			335	1.00	0.73	
27	2051			335	1.00	0.73	
28	2052			335	1.00	0.73	
29	2053			335	1.00	0.73	
30	2054			335	1.00	0.73	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.19	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.01	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Unmitigated Construction Total
Receptor:	Existing School
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	2.90E-03	7.91E-03	581	3.00	1.00	0.04
2	2026	2.09E-03	4.17E-03	581	3.00	1.00	0.03
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.01	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.07	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Mitigated Construction Total
Receptor:	Existing School
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	6.87E-04	4.47E-03	581	3.00	1.00	0.01
2	2026	5.57E-04	2.90E-03	581	3.00	1.00	0.01
3	2027			581	3.00	1.00	
4	2028			581	3.00	1.00	
5	2029			581	3.00	1.00	
6	2030			581	3.00	1.00	
7	2031			581	3.00	1.00	
8	2032			581	3.00	1.00	
9	2033			581	3.00	1.00	
10	2034			581	3.00	1.00	
11	2035			581	3.00	1.00	
12	2036			581	3.00	1.00	

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.02	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Unmitigated Construction Total
Receptor:	Offsite Worker
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	4.71E-01	8.92E-01	230	1.00	1.00	1.17
2	2026	3.41E-01	3.59E-01	230	1.00	1.00	0.84
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.89	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
Yes	Significant?
0.09	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
2.01	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Mitigated Construction Total
Receptor:	Offsite Worker
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at work	Cancer Risk
1	2025	5.71E-02	2.66E-01	230	1.00	1.00	0.14
2	2026	5.44E-02	1.89E-01	230	1.00	1.00	0.13
3	2027			230	1.00	1.00	
4	2028			230	1.00	1.00	
5	2029			230	1.00	1.00	
6	2030			230	1.00	1.00	
7	2031			230	1.00	1.00	
8	2032			230	1.00	1.00	
9	2033			230	1.00	1.00	
10	2034			230	1.00	1.00	
11	2035			230	1.00	1.00	
12	2036			230	1.00	1.00	

0.27	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.28	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Haul Trucks
Receptor:	Existing Residence
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		3.78E-05	1.70E-04	361	10.0	0.85	0.00
1	2025	3.78E-05	1.70E-04	1,090	10.0	0.85	0.01
2	2026	3.78E-05	1.70E-04	1,090	10.0	0.85	0.01
3	2027	3.78E-05	1.70E-04	745	3.00	0.72	0.00
4	2028	3.78E-05	1.70E-04	745	3.00	0.72	0.00
5	2029	3.78E-05	1.70E-04	745	3.00	0.72	0.00
6	2030	3.78E-05	1.70E-04	745	3.00	0.72	0.00
7	2031	3.78E-05	1.70E-04	745	3.00	0.72	0.00
8	2032	3.78E-05	1.70E-04	745	3.00	0.72	0.00
9	2033	3.78E-05	1.70E-04	745	3.00	0.72	0.00
10	2034	3.78E-05	1.70E-04	745	3.00	0.72	0.00
11	2035	3.78E-05	1.70E-04	745	3.00	0.72	0.00
12	2036	3.78E-05	1.70E-04	745	3.00	0.72	0.00
13	2037	3.78E-05	1.70E-04	745	3.00	0.72	0.00
14	2038	3.78E-05	1.70E-04	745	3.00	0.72	0.00
15	2039	3.78E-05	1.70E-04	745	3.00	0.72	0.00
16	2040	3.78E-05	1.70E-04	745	3.00	0.72	0.00
17	2041	3.78E-05	1.70E-04	335	1.70	0.73	0.00
18	2042	3.78E-05	1.70E-04	335	1.00	0.73	0.00
19	2043	3.78E-05	1.70E-04	335	1.00	0.73	0.00
20	2044	3.78E-05	1.70E-04	335	1.00	0.73	0.00
21	2045	3.78E-05	1.70E-04	335	1.00	0.73	0.00
22	2046	3.78E-05	1.70E-04	335	1.00	0.73	0.00
23	2047	3.78E-05	1.70E-04	335	1.00	0.73	0.00
24	2048	3.78E-05	1.70E-04	335	1.00	0.73	0.00
25	2049	3.78E-05	1.70E-04	335	1.00	0.73	0.00
26	2050	3.78E-05	1.70E-04	335	1.00	0.73	0.00
27	2051	3.78E-05	1.70E-04	335	1.00	0.73	0.00
28	2052	3.78E-05	1.70E-04	335	1.00	0.73	0.00
29	2053	3.78E-05	1.70E-04	335	1.00	0.73	0.00
30	2054	3.78E-05	1.70E-04	335	1.00	0.73	0.00

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.03	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.01	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Haul Trucks
Receptor:	Existing School
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	3.11E-05	1.40E-04	581	3.00	1.00	0.00
2	2026	3.11E-05	1.40E-04	581	3.00	1.00	0.00
3	2027	3.11E-05	1.40E-04	581	3.00	1.00	0.00
4	2028	3.11E-05	1.40E-04	581	3.00	1.00	0.00
5	2029	3.11E-05	1.40E-04	581	3.00	1.00	0.00
6	2030	3.11E-05	1.40E-04	581	3.00	1.00	0.00
7	2031	3.11E-05	1.40E-04	581	3.00	1.00	0.00
8	2032	3.11E-05	1.40E-04	581	3.00	1.00	0.00
9	2033	3.11E-05	1.40E-04	581	3.00	1.00	0.00
10	2034	3.11E-05	1.40E-04	581	3.00	1.00	0.00
11	2035	3.11E-05	1.40E-04	581	3.00	1.00	0.00
12	2036	3.11E-05	1.40E-04	581	3.00	1.00	0.00

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.01	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Haul Trucks
Receptor:	Offsite Worker
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	8.67E-03	3.90E-02	230	1.00	1.00	0.02
2	2026	8.67E-03	3.90E-02	230	1.00	1.00	0.02
3	2027	8.67E-03	3.90E-02	230	1.00	1.00	0.02
4	2028	8.67E-03	3.90E-02	230	1.00	1.00	0.02
5	2029	8.67E-03	3.90E-02	230	1.00	1.00	0.02
6	2030	8.67E-03	3.90E-02	230	1.00	1.00	0.02
7	2031	8.67E-03	3.90E-02	230	1.00	1.00	0.02
8	2032	8.67E-03	3.90E-02	230	1.00	1.00	0.02
9	2033	8.67E-03	3.90E-02	230	1.00	1.00	0.02
10	2034	8.67E-03	3.90E-02	230	1.00	1.00	0.02
11	2035	8.67E-03	3.90E-02	230	1.00	1.00	0.02
12	2036	8.67E-03	3.90E-02	230	1.00	1.00	0.02
13	2037	8.67E-03	3.90E-02	230	1.00	1.00	0.02
14	2038	8.67E-03	3.90E-02	230	1.00	1.00	0.02
15	2039	8.67E-03	3.90E-02	230	1.00	1.00	0.02
16	2040	8.67E-03	3.90E-02	230	1.00	1.00	0.02
17	2041	8.67E-03	3.90E-02	230	1.00	1.00	0.02
18	2042	8.67E-03	3.90E-02	230	1.00	1.00	0.02
19	2043	8.67E-03	3.90E-02	230	1.00	1.00	0.02
20	2044	8.67E-03	3.90E-02	230	1.00	1.00	0.02
21	2045	8.67E-03	3.90E-02	230	1.00	1.00	0.02
22	2046	8.67E-03	3.90E-02	230	1.00	1.00	0.02
23	2047	8.67E-03	3.90E-02	230	1.00	1.00	0.02
24	2048	8.67E-03	3.90E-02	230	1.00	1.00	0.02
25	2049	8.67E-03	3.90E-02	230	1.00	1.00	0.02
26	2050	8.67E-03	3.90E-02	230	1.00	1.00	0.02
27	2051	8.67E-03	3.90E-02	230	1.00	1.00	0.02
28	2052	8.67E-03	3.90E-02	230	1.00	1.00	0.02
29	2053	8.67E-03	3.90E-02	230	1.00	1.00	0.02
30	2054	8.67E-03	3.90E-02	230	1.00	1.00	0.02

0.04	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.64	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

300	Chronic Reference Exposure Level (ug/m3) for Chloroform	
150	Acute Reference Exposure Level (ug/m3) for Chloroform	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	Chloroform
Source:	Cooling Tower
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour Chloroform Concentration (ug/m3)	Annual Chloroform Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		1.21E-03	7.72E-06	361	10.0	0.85	
1	2025	1.21E-03	7.72E-06	1,090	10.0	0.85	
2	2026	1.21E-03	7.72E-06	1,090	10.0	0.85	
3	2027	1.21E-03	7.72E-06	745	3.00	0.72	
4	2028	1.21E-03	7.72E-06	745	3.00	0.72	
5	2029	1.21E-03	7.72E-06	745	3.00	0.72	
6	2030	1.21E-03	7.72E-06	745	3.00	0.72	
7	2031	1.21E-03	7.72E-06	745	3.00	0.72	
8	2032	1.21E-03	7.72E-06	745	3.00	0.72	
9	2033	1.21E-03	7.72E-06	745	3.00	0.72	
10	2034	1.21E-03	7.72E-06	745	3.00	0.72	
11	2035	1.21E-03	7.72E-06	745	3.00	0.72	
12	2036	1.21E-03	7.72E-06	745	3.00	0.72	
13	2037	1.21E-03	7.72E-06	745	3.00	0.72	
14	2038	1.21E-03	7.72E-06	745	3.00	0.72	
15	2039	1.21E-03	7.72E-06	745	3.00	0.72	
16	2040	1.21E-03	7.72E-06	745	3.00	0.72	
17	2041	1.21E-03	7.72E-06	335	1.70	0.73	
18	2042	1.21E-03	7.72E-06	335	1.00	0.73	
19	2043	1.21E-03	7.72E-06	335	1.00	0.73	
20	2044	1.21E-03	7.72E-06	335	1.00	0.73	
21	2045	1.21E-03	7.72E-06	335	1.00	0.73	
22	2046	1.21E-03	7.72E-06	335	1.00	0.73	
23	2047	1.21E-03	7.72E-06	335	1.00	0.73	
24	2048	1.21E-03	7.72E-06	335	1.00	0.73	
25	2049	1.21E-03	7.72E-06	335	1.00	0.73	
26	2050	1.21E-03	7.72E-06	335	1.00	0.73	
27	2051	1.21E-03	7.72E-06	335	1.00	0.73	
28	2052	1.21E-03	7.72E-06	335	1.00	0.73	
29	2053	1.21E-03	7.72E-06	335	1.00	0.73	
30	2054	1.21E-03	7.72E-06	335	1.00	0.73	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL	
2,100	Acute Reference Exposure Level (ug/m3) for HCL	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	HCL-Uncontrolled
Source:	Scrubber
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		4.01E+00	3.45E-02	361	10.0	0.85	
1	2025	4.01E+00	3.45E-02	1,090	10.0	0.85	
2	2026	4.01E+00	3.45E-02	1,090	10.0	0.85	
3	2027	4.01E+00	3.45E-02	745	3.00	0.72	
4	2028	4.01E+00	3.45E-02	745	3.00	0.72	
5	2029	4.01E+00	3.45E-02	745	3.00	0.72	
6	2030	4.01E+00	3.45E-02	745	3.00	0.72	
7	2031	4.01E+00	3.45E-02	745	3.00	0.72	
8	2032	4.01E+00	3.45E-02	745	3.00	0.72	
9	2033	4.01E+00	3.45E-02	745	3.00	0.72	
10	2034	4.01E+00	3.45E-02	745	3.00	0.72	
11	2035	4.01E+00	3.45E-02	745	3.00	0.72	
12	2036	4.01E+00	3.45E-02	745	3.00	0.72	
13	2037	4.01E+00	3.45E-02	745	3.00	0.72	
14	2038	4.01E+00	3.45E-02	745	3.00	0.72	
15	2039	4.01E+00	3.45E-02	745	3.00	0.72	
16	2040	4.01E+00	3.45E-02	745	3.00	0.72	
17	2041	4.01E+00	3.45E-02	335	1.70	0.73	
18	2042	4.01E+00	3.45E-02	335	1.00	0.73	
19	2043	4.01E+00	3.45E-02	335	1.00	0.73	
20	2044	4.01E+00	3.45E-02	335	1.00	0.73	
21	2045	4.01E+00	3.45E-02	335	1.00	0.73	
22	2046	4.01E+00	3.45E-02	335	1.00	0.73	
23	2047	4.01E+00	3.45E-02	335	1.00	0.73	
24	2048	4.01E+00	3.45E-02	335	1.00	0.73	
25	2049	4.01E+00	3.45E-02	335	1.00	0.73	
26	2050	4.01E+00	3.45E-02	335	1.00	0.73	
27	2051	4.01E+00	3.45E-02	335	1.00	0.73	
28	2052	4.01E+00	3.45E-02	335	1.00	0.73	
29	2053	4.01E+00	3.45E-02	335	1.00	0.73	
30	2054	4.01E+00	3.45E-02	335	1.00	0.73	

0.12	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL	
2,100	Acute Reference Exposure Level (ug/m3) for HCL	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	HCL-Stage 1
Source:	Scrubber
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		1.20E-01	1.03E-03	361	10.0	0.85	
1	2025	1.20E-01	1.03E-03	1,090	10.0	0.85	
2	2026	1.20E-01	1.03E-03	1,090	10.0	0.85	
3	2027	1.20E-01	1.03E-03	745	3.00	0.72	
4	2028	1.20E-01	1.03E-03	745	3.00	0.72	
5	2029	1.20E-01	1.03E-03	745	3.00	0.72	
6	2030	1.20E-01	1.03E-03	745	3.00	0.72	
7	2031	1.20E-01	1.03E-03	745	3.00	0.72	
8	2032	1.20E-01	1.03E-03	745	3.00	0.72	
9	2033	1.20E-01	1.03E-03	745	3.00	0.72	
10	2034	1.20E-01	1.03E-03	745	3.00	0.72	
11	2035	1.20E-01	1.03E-03	745	3.00	0.72	
12	2036	1.20E-01	1.03E-03	745	3.00	0.72	
13	2037	1.20E-01	1.03E-03	745	3.00	0.72	
14	2038	1.20E-01	1.03E-03	745	3.00	0.72	
15	2039	1.20E-01	1.03E-03	745	3.00	0.72	
16	2040	1.20E-01	1.03E-03	745	3.00	0.72	
17	2041	1.20E-01	1.03E-03	335	1.70	0.73	
18	2042	1.20E-01	1.03E-03	335	1.00	0.73	
19	2043	1.20E-01	1.03E-03	335	1.00	0.73	
20	2044	1.20E-01	1.03E-03	335	1.00	0.73	
21	2045	1.20E-01	1.03E-03	335	1.00	0.73	
22	2046	1.20E-01	1.03E-03	335	1.00	0.73	
23	2047	1.20E-01	1.03E-03	335	1.00	0.73	
24	2048	1.20E-01	1.03E-03	335	1.00	0.73	
25	2049	1.20E-01	1.03E-03	335	1.00	0.73	
26	2050	1.20E-01	1.03E-03	335	1.00	0.73	
27	2051	1.20E-01	1.03E-03	335	1.00	0.73	
28	2052	1.20E-01	1.03E-03	335	1.00	0.73	
29	2053	1.20E-01	1.03E-03	335	1.00	0.73	
30	2054	1.20E-01	1.03E-03	335	1.00	0.73	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL	
2,100	Acute Reference Exposure Level (ug/m3) for HCL	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	HCL-Stage 2
Source:	Scrubber
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		1.20E-05	1.03E-07	361	10.0	0.85	
1	2025	1.20E-05	1.03E-07	1,090	10.0	0.85	
2	2026	1.20E-05	1.03E-07	1,090	10.0	0.85	
3	2027	1.20E-05	1.03E-07	745	3.00	0.72	
4	2028	1.20E-05	1.03E-07	745	3.00	0.72	
5	2029	1.20E-05	1.03E-07	745	3.00	0.72	
6	2030	1.20E-05	1.03E-07	745	3.00	0.72	
7	2031	1.20E-05	1.03E-07	745	3.00	0.72	
8	2032	1.20E-05	1.03E-07	745	3.00	0.72	
9	2033	1.20E-05	1.03E-07	745	3.00	0.72	
10	2034	1.20E-05	1.03E-07	745	3.00	0.72	
11	2035	1.20E-05	1.03E-07	745	3.00	0.72	
12	2036	1.20E-05	1.03E-07	745	3.00	0.72	
13	2037	1.20E-05	1.03E-07	745	3.00	0.72	
14	2038	1.20E-05	1.03E-07	745	3.00	0.72	
15	2039	1.20E-05	1.03E-07	745	3.00	0.72	
16	2040	1.20E-05	1.03E-07	745	3.00	0.72	
17	2041	1.20E-05	1.03E-07	335	1.70	0.73	
18	2042	1.20E-05	1.03E-07	335	1.00	0.73	
19	2043	1.20E-05	1.03E-07	335	1.00	0.73	
20	2044	1.20E-05	1.03E-07	335	1.00	0.73	
21	2045	1.20E-05	1.03E-07	335	1.00	0.73	
22	2046	1.20E-05	1.03E-07	335	1.00	0.73	
23	2047	1.20E-05	1.03E-07	335	1.00	0.73	
24	2048	1.20E-05	1.03E-07	335	1.00	0.73	
25	2049	1.20E-05	1.03E-07	335	1.00	0.73	
26	2050	1.20E-05	1.03E-07	335	1.00	0.73	
27	2051	1.20E-05	1.03E-07	335	1.00	0.73	
28	2052	1.20E-05	1.03E-07	335	1.00	0.73	
29	2053	1.20E-05	1.03E-07	335	1.00	0.73	
30	2054	1.20E-05	1.03E-07	335	1.00	0.73	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

300	Chronic Reference Exposure Level (ug/m3) for Chloroform
150	Acute Reference Exposure Level (ug/m3) for Chloroform
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Existing School
Pollutant:	Chloroform
Source:	Cooling Tower
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour Chloroform Concentration (ug/m3)	Annual Chloroform Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	2.22E-03	5.82E-06	581	3.00	1.00	
2	2026	2.22E-03	5.82E-06	581	3.00	1.00	
3	2027	2.22E-03	5.82E-06	581	3.00	1.00	
4	2028	2.22E-03	5.82E-06	581	3.00	1.00	
5	2029	2.22E-03	5.82E-06	581	3.00	1.00	
6	2030	2.22E-03	5.82E-06	581	3.00	1.00	
7	2031	2.22E-03	5.82E-06	581	3.00	1.00	
8	2032	2.22E-03	5.82E-06	581	3.00	1.00	
9	2033	2.22E-03	5.82E-06	581	3.00	1.00	
10	2034	2.22E-03	5.82E-06	581	3.00	1.00	
11	2035	2.22E-03	5.82E-06	581	3.00	1.00	
12	2036	2.22E-03	5.82E-06	581	3.00	1.00	
13	2037	2.22E-03	5.82E-06	581	3.00	1.00	
14	2038	2.22E-03	5.82E-06	581	3.00	1.00	
15	2039	2.22E-03	5.82E-06	581	3.00	1.00	
16	2040	2.22E-03	5.82E-06	581	3.00	1.00	
17	2041	2.22E-03	5.82E-06	581	3.00	1.00	
18	2042	2.22E-03	5.82E-06	581	3.00	1.00	
19	2043	2.22E-03	5.82E-06	581	3.00	1.00	
20	2044	2.22E-03	5.82E-06	581	3.00	1.00	
21	2045	2.22E-03	5.82E-06	581	3.00	1.00	
22	2046	2.22E-03	5.82E-06	581	3.00	1.00	
23	2047	2.22E-03	5.82E-06	581	3.00	1.00	
24	2048	2.22E-03	5.82E-06	581	3.00	1.00	
25	2049	2.22E-03	5.82E-06	581	3.00	1.00	
26	2050	2.22E-03	5.82E-06	581	3.00	1.00	
27	2051	2.22E-03	5.82E-06	581	3.00	1.00	
28	2052	2.22E-03	5.82E-06	581	3.00	1.00	
29	2053	2.22E-03	5.82E-06	581	3.00	1.00	
30	2054	2.22E-03	5.82E-06	581	3.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Existing School
Pollutant:	HCL-Uncontrolled
Source:	Scrubber
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	3.76E+00	2.27E-02	581	3.00	1.00	
2	2026	3.76E+00	2.27E-02	581	3.00	1.00	
3	2027	3.76E+00	2.27E-02	581	3.00	1.00	
4	2028	3.76E+00	2.27E-02	581	3.00	1.00	
5	2029	3.76E+00	2.27E-02	581	3.00	1.00	
6	2030	3.76E+00	2.27E-02	581	3.00	1.00	
7	2031	3.76E+00	2.27E-02	581	3.00	1.00	
8	2032	3.76E+00	2.27E-02	581	3.00	1.00	
9	2033	3.76E+00	2.27E-02	581	3.00	1.00	
10	2034	3.76E+00	2.27E-02	581	3.00	1.00	
11	2035	3.76E+00	2.27E-02	581	3.00	1.00	
12	2036	3.76E+00	2.27E-02	581	3.00	1.00	
13	2037	3.76E+00	2.27E-02	581	3.00	1.00	
14	2038	3.76E+00	2.27E-02	581	3.00	1.00	
15	2039	3.76E+00	2.27E-02	581	3.00	1.00	
16	2040	3.76E+00	2.27E-02	581	3.00	1.00	
17	2041	3.76E+00	2.27E-02	581	3.00	1.00	
18	2042	3.76E+00	2.27E-02	581	3.00	1.00	
19	2043	3.76E+00	2.27E-02	581	3.00	1.00	
20	2044	3.76E+00	2.27E-02	581	3.00	1.00	
21	2045	3.76E+00	2.27E-02	581	3.00	1.00	
22	2046	3.76E+00	2.27E-02	581	3.00	1.00	
23	2047	3.76E+00	2.27E-02	581	3.00	1.00	
24	2048	3.76E+00	2.27E-02	581	3.00	1.00	
25	2049	3.76E+00	2.27E-02	581	3.00	1.00	
26	2050	3.76E+00	2.27E-02	581	3.00	1.00	
27	2051	3.76E+00	2.27E-02	581	3.00	1.00	
28	2052	3.76E+00	2.27E-02	581	3.00	1.00	
29	2053	3.76E+00	2.27E-02	581	3.00	1.00	
30	2054	3.76E+00	2.27E-02	581	3.00	1.00	

0.08	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Existing School
Pollutant:	HCL-Stage 1
Source:	Scrubber
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	1.13E-01	6.81E-04	581	3.00	1.00	
2	2026	1.13E-01	6.81E-04	581	3.00	1.00	
3	2027	1.13E-01	6.81E-04	581	3.00	1.00	
4	2028	1.13E-01	6.81E-04	581	3.00	1.00	
5	2029	1.13E-01	6.81E-04	581	3.00	1.00	
6	2030	1.13E-01	6.81E-04	581	3.00	1.00	
7	2031	1.13E-01	6.81E-04	581	3.00	1.00	
8	2032	1.13E-01	6.81E-04	581	3.00	1.00	
9	2033	1.13E-01	6.81E-04	581	3.00	1.00	
10	2034	1.13E-01	6.81E-04	581	3.00	1.00	
11	2035	1.13E-01	6.81E-04	581	3.00	1.00	
12	2036	1.13E-01	6.81E-04	581	3.00	1.00	
13	2037	1.13E-01	6.81E-04	581	3.00	1.00	
14	2038	1.13E-01	6.81E-04	581	3.00	1.00	
15	2039	1.13E-01	6.81E-04	581	3.00	1.00	
16	2040	1.13E-01	6.81E-04	581	3.00	1.00	
17	2041	1.13E-01	6.81E-04	581	3.00	1.00	
18	2042	1.13E-01	6.81E-04	581	3.00	1.00	
19	2043	1.13E-01	6.81E-04	581	3.00	1.00	
20	2044	1.13E-01	6.81E-04	581	3.00	1.00	
21	2045	1.13E-01	6.81E-04	581	3.00	1.00	
22	2046	1.13E-01	6.81E-04	581	3.00	1.00	
23	2047	1.13E-01	6.81E-04	581	3.00	1.00	
24	2048	1.13E-01	6.81E-04	581	3.00	1.00	
25	2049	1.13E-01	6.81E-04	581	3.00	1.00	
26	2050	1.13E-01	6.81E-04	581	3.00	1.00	
27	2051	1.13E-01	6.81E-04	581	3.00	1.00	
28	2052	1.13E-01	6.81E-04	581	3.00	1.00	
29	2053	1.13E-01	6.81E-04	581	3.00	1.00	
30	2054	1.13E-01	6.81E-04	581	3.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Existing School
Pollutant:	HCL-Stage 2
Source:	Scrubber
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	1.13E-05	6.81E-08	581	3.00	1.00	
2	2026	1.13E-05	6.81E-08	581	3.00	1.00	
3	2027	1.13E-05	6.81E-08	581	3.00	1.00	
4	2028	1.13E-05	6.81E-08	581	3.00	1.00	
5	2029	1.13E-05	6.81E-08	581	3.00	1.00	
6	2030	1.13E-05	6.81E-08	581	3.00	1.00	
7	2031	1.13E-05	6.81E-08	581	3.00	1.00	
8	2032	1.13E-05	6.81E-08	581	3.00	1.00	
9	2033	1.13E-05	6.81E-08	581	3.00	1.00	
10	2034	1.13E-05	6.81E-08	581	3.00	1.00	
11	2035	1.13E-05	6.81E-08	581	3.00	1.00	
12	2036	1.13E-05	6.81E-08	581	3.00	1.00	
13	2037	1.13E-05	6.81E-08	581	3.00	1.00	
14	2038	1.13E-05	6.81E-08	581	3.00	1.00	
15	2039	1.13E-05	6.81E-08	581	3.00	1.00	
16	2040	1.13E-05	6.81E-08	581	3.00	1.00	
17	2041	1.13E-05	6.81E-08	581	3.00	1.00	
18	2042	1.13E-05	6.81E-08	581	3.00	1.00	
19	2043	1.13E-05	6.81E-08	581	3.00	1.00	
20	2044	1.13E-05	6.81E-08	581	3.00	1.00	
21	2045	1.13E-05	6.81E-08	581	3.00	1.00	
22	2046	1.13E-05	6.81E-08	581	3.00	1.00	
23	2047	1.13E-05	6.81E-08	581	3.00	1.00	
24	2048	1.13E-05	6.81E-08	581	3.00	1.00	
25	2049	1.13E-05	6.81E-08	581	3.00	1.00	
26	2050	1.13E-05	6.81E-08	581	3.00	1.00	
27	2051	1.13E-05	6.81E-08	581	3.00	1.00	
28	2052	1.13E-05	6.81E-08	581	3.00	1.00	
29	2053	1.13E-05	6.81E-08	581	3.00	1.00	
30	2054	1.13E-05	6.81E-08	581	3.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

300	Chronic Reference Exposure Level (ug/m3) for Chloroform
150	Acute Reference Exposure Level (ug/m3) for Chloroform
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	Chloroform
Source:	Cooling Tower
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour Chloroform Concentration (ug/m3)	Annual Chloroform Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	3.27E-02	5.00E-04	230	1.00	1.00	
2	2026	3.27E-02	5.00E-04	230	1.00	1.00	
3	2027	3.27E-02	5.00E-04	230	1.00	1.00	
4	2028	3.27E-02	5.00E-04	230	1.00	1.00	
5	2029	3.27E-02	5.00E-04	230	1.00	1.00	
6	2030	3.27E-02	5.00E-04	230	1.00	1.00	
7	2031	3.27E-02	5.00E-04	230	1.00	1.00	
8	2032	3.27E-02	5.00E-04	230	1.00	1.00	
9	2033	3.27E-02	5.00E-04	230	1.00	1.00	
10	2034	3.27E-02	5.00E-04	230	1.00	1.00	
11	2035	3.27E-02	5.00E-04	230	1.00	1.00	
12	2036	3.27E-02	5.00E-04	230	1.00	1.00	
13	2037	3.27E-02	5.00E-04	230	1.00	1.00	
14	2038	3.27E-02	5.00E-04	230	1.00	1.00	
15	2039	3.27E-02	5.00E-04	230	1.00	1.00	
16	2040	3.27E-02	5.00E-04	230	1.00	1.00	
17	2041	3.27E-02	5.00E-04	230	1.00	1.00	
18	2042	3.27E-02	5.00E-04	230	1.00	1.00	
19	2043	3.27E-02	5.00E-04	230	1.00	1.00	
20	2044	3.27E-02	5.00E-04	230	1.00	1.00	
21	2045	3.27E-02	5.00E-04	230	1.00	1.00	
22	2046	3.27E-02	5.00E-04	230	1.00	1.00	
23	2047	3.27E-02	5.00E-04	230	1.00	1.00	
24	2048	3.27E-02	5.00E-04	230	1.00	1.00	
25	2049	3.27E-02	5.00E-04	230	1.00	1.00	
26	2050	3.27E-02	5.00E-04	230	1.00	1.00	
27	2051	3.27E-02	5.00E-04	230	1.00	1.00	
28	2052	3.27E-02	5.00E-04	230	1.00	1.00	
29	2053	3.27E-02	5.00E-04	230	1.00	1.00	
30	2054	3.27E-02	5.00E-04	230	1.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	HCL-Uncontrolled
Source:	Scrubber
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	1.01E+02	3.75E+00	230	1.00	1.00	
2	2026	1.01E+02	3.75E+00	230	1.00	1.00	
3	2027	1.01E+02	3.75E+00	230	1.00	1.00	
4	2028	1.01E+02	3.75E+00	230	1.00	1.00	
5	2029	1.01E+02	3.75E+00	230	1.00	1.00	
6	2030	1.01E+02	3.75E+00	230	1.00	1.00	
7	2031	1.01E+02	3.75E+00	230	1.00	1.00	
8	2032	1.01E+02	3.75E+00	230	1.00	1.00	
9	2033	1.01E+02	3.75E+00	230	1.00	1.00	
10	2034	1.01E+02	3.75E+00	230	1.00	1.00	
11	2035	1.01E+02	3.75E+00	230	1.00	1.00	
12	2036	1.01E+02	3.75E+00	230	1.00	1.00	
13	2037	1.01E+02	3.75E+00	230	1.00	1.00	
14	2038	1.01E+02	3.75E+00	230	1.00	1.00	
15	2039	1.01E+02	3.75E+00	230	1.00	1.00	
16	2040	1.01E+02	3.75E+00	230	1.00	1.00	
17	2041	1.01E+02	3.75E+00	230	1.00	1.00	
18	2042	1.01E+02	3.75E+00	230	1.00	1.00	
19	2043	1.01E+02	3.75E+00	230	1.00	1.00	
20	2044	1.01E+02	3.75E+00	230	1.00	1.00	
21	2045	1.01E+02	3.75E+00	230	1.00	1.00	
22	2046	1.01E+02	3.75E+00	230	1.00	1.00	
23	2047	1.01E+02	3.75E+00	230	1.00	1.00	
24	2048	1.01E+02	3.75E+00	230	1.00	1.00	
25	2049	1.01E+02	3.75E+00	230	1.00	1.00	
26	2050	1.01E+02	3.75E+00	230	1.00	1.00	
27	2051	1.01E+02	3.75E+00	230	1.00	1.00	
28	2052	1.01E+02	3.75E+00	230	1.00	1.00	
29	2053	1.01E+02	3.75E+00	230	1.00	1.00	
30	2054	1.01E+02	3.75E+00	230	1.00	1.00	

12.49	Chronic Hazard Impact
1	Significance Threshold
Yes	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.05	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	HCL-Stage 1
Source:	Scrubber
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	3.04E+00	1.12E-01	230	1.00	1.00	
2	2026	3.04E+00	1.12E-01	230	1.00	1.00	
3	2027	3.04E+00	1.12E-01	230	1.00	1.00	
4	2028	3.04E+00	1.12E-01	230	1.00	1.00	
5	2029	3.04E+00	1.12E-01	230	1.00	1.00	
6	2030	3.04E+00	1.12E-01	230	1.00	1.00	
7	2031	3.04E+00	1.12E-01	230	1.00	1.00	
8	2032	3.04E+00	1.12E-01	230	1.00	1.00	
9	2033	3.04E+00	1.12E-01	230	1.00	1.00	
10	2034	3.04E+00	1.12E-01	230	1.00	1.00	
11	2035	3.04E+00	1.12E-01	230	1.00	1.00	
12	2036	3.04E+00	1.12E-01	230	1.00	1.00	
13	2037	3.04E+00	1.12E-01	230	1.00	1.00	
14	2038	3.04E+00	1.12E-01	230	1.00	1.00	
15	2039	3.04E+00	1.12E-01	230	1.00	1.00	
16	2040	3.04E+00	1.12E-01	230	1.00	1.00	
17	2041	3.04E+00	1.12E-01	230	1.00	1.00	
18	2042	3.04E+00	1.12E-01	230	1.00	1.00	
19	2043	3.04E+00	1.12E-01	230	1.00	1.00	
20	2044	3.04E+00	1.12E-01	230	1.00	1.00	
21	2045	3.04E+00	1.12E-01	230	1.00	1.00	
22	2046	3.04E+00	1.12E-01	230	1.00	1.00	
23	2047	3.04E+00	1.12E-01	230	1.00	1.00	
24	2048	3.04E+00	1.12E-01	230	1.00	1.00	
25	2049	3.04E+00	1.12E-01	230	1.00	1.00	
26	2050	3.04E+00	1.12E-01	230	1.00	1.00	
27	2051	3.04E+00	1.12E-01	230	1.00	1.00	
28	2052	3.04E+00	1.12E-01	230	1.00	1.00	
29	2053	3.04E+00	1.12E-01	230	1.00	1.00	
30	2054	3.04E+00	1.12E-01	230	1.00	1.00	

0.37	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	HCL-Stage 2
Source:	Scrubber
Meteorological:	Concord Buchanan Field

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	3.04E-04	1.12E-05	230	1.00	1.00	
2	2026	3.04E-04	1.12E-05	230	1.00	1.00	
3	2027	3.04E-04	1.12E-05	230	1.00	1.00	
4	2028	3.04E-04	1.12E-05	230	1.00	1.00	
5	2029	3.04E-04	1.12E-05	230	1.00	1.00	
6	2030	3.04E-04	1.12E-05	230	1.00	1.00	
7	2031	3.04E-04	1.12E-05	230	1.00	1.00	
8	2032	3.04E-04	1.12E-05	230	1.00	1.00	
9	2033	3.04E-04	1.12E-05	230	1.00	1.00	
10	2034	3.04E-04	1.12E-05	230	1.00	1.00	
11	2035	3.04E-04	1.12E-05	230	1.00	1.00	
12	2036	3.04E-04	1.12E-05	230	1.00	1.00	
13	2037	3.04E-04	1.12E-05	230	1.00	1.00	
14	2038	3.04E-04	1.12E-05	230	1.00	1.00	
15	2039	3.04E-04	1.12E-05	230	1.00	1.00	
16	2040	3.04E-04	1.12E-05	230	1.00	1.00	
17	2041	3.04E-04	1.12E-05	230	1.00	1.00	
18	2042	3.04E-04	1.12E-05	230	1.00	1.00	
19	2043	3.04E-04	1.12E-05	230	1.00	1.00	
20	2044	3.04E-04	1.12E-05	230	1.00	1.00	
21	2045	3.04E-04	1.12E-05	230	1.00	1.00	
22	2046	3.04E-04	1.12E-05	230	1.00	1.00	
23	2047	3.04E-04	1.12E-05	230	1.00	1.00	
24	2048	3.04E-04	1.12E-05	230	1.00	1.00	
25	2049	3.04E-04	1.12E-05	230	1.00	1.00	
26	2050	3.04E-04	1.12E-05	230	1.00	1.00	
27	2051	3.04E-04	1.12E-05	230	1.00	1.00	
28	2052	3.04E-04	1.12E-05	230	1.00	1.00	
29	2053	3.04E-04	1.12E-05	230	1.00	1.00	
30	2054	3.04E-04	1.12E-05	230	1.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM	
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Haul Trucks
Receptor:	Existing Residence
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		8.75E-05	3.94E-04	361	10.0	0.85	0.00
1	2025	8.75E-05	3.94E-04	1,090	10.0	0.85	0.01
2	2026	8.75E-05	3.94E-04	1,090	10.0	0.85	0.01
3	2027	8.75E-05	3.94E-04	745	3.00	0.72	0.00
4	2028	8.75E-05	3.94E-04	745	3.00	0.72	0.00
5	2029	8.75E-05	3.94E-04	745	3.00	0.72	0.00
6	2030	8.75E-05	3.94E-04	745	3.00	0.72	0.00
7	2031	8.75E-05	3.94E-04	745	3.00	0.72	0.00
8	2032	8.75E-05	3.94E-04	745	3.00	0.72	0.00
9	2033	8.75E-05	3.94E-04	745	3.00	0.72	0.00
10	2034	8.75E-05	3.94E-04	745	3.00	0.72	0.00
11	2035	8.75E-05	3.94E-04	745	3.00	0.72	0.00
12	2036	8.75E-05	3.94E-04	745	3.00	0.72	0.00
13	2037	8.75E-05	3.94E-04	745	3.00	0.72	0.00
14	2038	8.75E-05	3.94E-04	745	3.00	0.72	0.00
15	2039	8.75E-05	3.94E-04	745	3.00	0.72	0.00
16	2040	8.75E-05	3.94E-04	745	3.00	0.72	0.00
17	2041	8.75E-05	3.94E-04	335	1.70	0.73	0.00
18	2042	8.75E-05	3.94E-04	335	1.00	0.73	0.00
19	2043	8.75E-05	3.94E-04	335	1.00	0.73	0.00
20	2044	8.75E-05	3.94E-04	335	1.00	0.73	0.00
21	2045	8.75E-05	3.94E-04	335	1.00	0.73	0.00
22	2046	8.75E-05	3.94E-04	335	1.00	0.73	0.00
23	2047	8.75E-05	3.94E-04	335	1.00	0.73	0.00
24	2048	8.75E-05	3.94E-04	335	1.00	0.73	0.00
25	2049	8.75E-05	3.94E-04	335	1.00	0.73	0.00
26	2050	8.75E-05	3.94E-04	335	1.00	0.73	0.00
27	2051	8.75E-05	3.94E-04	335	1.00	0.73	0.00
28	2052	8.75E-05	3.94E-04	335	1.00	0.73	0.00
29	2053	8.75E-05	3.94E-04	335	1.00	0.73	0.00
30	2054	8.75E-05	3.94E-04	335	1.00	0.73	0.00

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.06	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
0.02	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Haul Trucks
Receptor:	Existing School
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	1.58E-04	7.11E-04	581	3.00	1.00	0.00
2	2026	1.58E-04	7.11E-04	581	3.00	1.00	0.00
3	2027	1.58E-04	7.11E-04	581	3.00	1.00	0.00
4	2028	1.58E-04	7.11E-04	581	3.00	1.00	0.00
5	2029	1.58E-04	7.11E-04	581	3.00	1.00	0.00
6	2030	1.58E-04	7.11E-04	581	3.00	1.00	0.00
7	2031	1.58E-04	7.11E-04	581	3.00	1.00	0.00
8	2032	1.58E-04	7.11E-04	581	3.00	1.00	0.00
9	2033	1.58E-04	7.11E-04	581	3.00	1.00	0.00
10	2034	1.58E-04	7.11E-04	581	3.00	1.00	0.00
11	2035	1.58E-04	7.11E-04	581	3.00	1.00	0.00
12	2036	1.58E-04	7.11E-04	581	3.00	1.00	0.00

0.00	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.03	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

5	Chronic Reference Exposure Level (ug/m3) for DPM
1.1	Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Haul Trucks
Receptor:	Offsite Worker
Meteorological:	Dow

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Annual PM2.5 Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	1.08E-02	4.86E-02	230	1.00	1.00	0.03
2	2026	1.08E-02	4.86E-02	230	1.00	1.00	0.03
3	2027	1.08E-02	4.86E-02	230	1.00	1.00	0.03
4	2028	1.08E-02	4.86E-02	230	1.00	1.00	0.03
5	2029	1.08E-02	4.86E-02	230	1.00	1.00	0.03
6	2030	1.08E-02	4.86E-02	230	1.00	1.00	0.03
7	2031	1.08E-02	4.86E-02	230	1.00	1.00	0.03
8	2032	1.08E-02	4.86E-02	230	1.00	1.00	0.03
9	2033	1.08E-02	4.86E-02	230	1.00	1.00	0.03
10	2034	1.08E-02	4.86E-02	230	1.00	1.00	0.03
11	2035	1.08E-02	4.86E-02	230	1.00	1.00	0.03
12	2036	1.08E-02	4.86E-02	230	1.00	1.00	0.03
13	2037	1.08E-02	4.86E-02	230	1.00	1.00	0.03
14	2038	1.08E-02	4.86E-02	230	1.00	1.00	0.03
15	2039	1.08E-02	4.86E-02	230	1.00	1.00	0.03
16	2040	1.08E-02	4.86E-02	230	1.00	1.00	0.03
17	2041	1.08E-02	4.86E-02	230	1.00	1.00	0.03
18	2042	1.08E-02	4.86E-02	230	1.00	1.00	0.03
19	2043	1.08E-02	4.86E-02	230	1.00	1.00	0.03
20	2044	1.08E-02	4.86E-02	230	1.00	1.00	0.03
21	2045	1.08E-02	4.86E-02	230	1.00	1.00	0.03
22	2046	1.08E-02	4.86E-02	230	1.00	1.00	0.03
23	2047	1.08E-02	4.86E-02	230	1.00	1.00	0.03
24	2048	1.08E-02	4.86E-02	230	1.00	1.00	0.03
25	2049	1.08E-02	4.86E-02	230	1.00	1.00	0.03
26	2050	1.08E-02	4.86E-02	230	1.00	1.00	0.03
27	2051	1.08E-02	4.86E-02	230	1.00	1.00	0.03
28	2052	1.08E-02	4.86E-02	230	1.00	1.00	0.03
29	2053	1.08E-02	4.86E-02	230	1.00	1.00	0.03
30	2054	1.08E-02	4.86E-02	230	1.00	1.00	0.03

0.05	Maximum Annual PM2.5 Concentration (ug/m3)
0.3	Significance Threshold (ug/m3)
No	Significant?
0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
0.80	Cancer Risk
10	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

300	Chronic Reference Exposure Level (ug/m3) for Chloroform	
150	Acute Reference Exposure Level (ug/m3) for Chloroform	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	Chloroform
Source:	Cooling Tower
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour Chloroform Concentration (ug/m3)	Annual Chloroform Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		1.02E-02	2.74E-05	361	10.0	0.85	
1	2025	1.02E-02	2.74E-05	1,090	10.0	0.85	
2	2026	1.02E-02	2.74E-05	1,090	10.0	0.85	
3	2027	1.02E-02	2.74E-05	745	3.00	0.72	
4	2028	1.02E-02	2.74E-05	745	3.00	0.72	
5	2029	1.02E-02	2.74E-05	745	3.00	0.72	
6	2030	1.02E-02	2.74E-05	745	3.00	0.72	
7	2031	1.02E-02	2.74E-05	745	3.00	0.72	
8	2032	1.02E-02	2.74E-05	745	3.00	0.72	
9	2033	1.02E-02	2.74E-05	745	3.00	0.72	
10	2034	1.02E-02	2.74E-05	745	3.00	0.72	
11	2035	1.02E-02	2.74E-05	745	3.00	0.72	
12	2036	1.02E-02	2.74E-05	745	3.00	0.72	
13	2037	1.02E-02	2.74E-05	745	3.00	0.72	
14	2038	1.02E-02	2.74E-05	745	3.00	0.72	
15	2039	1.02E-02	2.74E-05	745	3.00	0.72	
16	2040	1.02E-02	2.74E-05	745	3.00	0.72	
17	2041	1.02E-02	2.74E-05	335	1.70	0.73	
18	2042	1.02E-02	2.74E-05	335	1.00	0.73	
19	2043	1.02E-02	2.74E-05	335	1.00	0.73	
20	2044	1.02E-02	2.74E-05	335	1.00	0.73	
21	2045	1.02E-02	2.74E-05	335	1.00	0.73	
22	2046	1.02E-02	2.74E-05	335	1.00	0.73	
23	2047	1.02E-02	2.74E-05	335	1.00	0.73	
24	2048	1.02E-02	2.74E-05	335	1.00	0.73	
25	2049	1.02E-02	2.74E-05	335	1.00	0.73	
26	2050	1.02E-02	2.74E-05	335	1.00	0.73	
27	2051	1.02E-02	2.74E-05	335	1.00	0.73	
28	2052	1.02E-02	2.74E-05	335	1.00	0.73	
29	2053	1.02E-02	2.74E-05	335	1.00	0.73	
30	2054	1.02E-02	2.74E-05	335	1.00	0.73	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL	
2,100	Acute Reference Exposure Level (ug/m3) for HCL	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	HCL-Uncontrolled
Source:	Scrubber
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		2.01E+01	8.69E-02	361	10.0	0.85	
1	2025	2.01E+01	8.69E-02	1,090	10.0	0.85	
2	2026	2.01E+01	8.69E-02	1,090	10.0	0.85	
3	2027	2.01E+01	8.69E-02	745	3.00	0.72	
4	2028	2.01E+01	8.69E-02	745	3.00	0.72	
5	2029	2.01E+01	8.69E-02	745	3.00	0.72	
6	2030	2.01E+01	8.69E-02	745	3.00	0.72	
7	2031	2.01E+01	8.69E-02	745	3.00	0.72	
8	2032	2.01E+01	8.69E-02	745	3.00	0.72	
9	2033	2.01E+01	8.69E-02	745	3.00	0.72	
10	2034	2.01E+01	8.69E-02	745	3.00	0.72	
11	2035	2.01E+01	8.69E-02	745	3.00	0.72	
12	2036	2.01E+01	8.69E-02	745	3.00	0.72	
13	2037	2.01E+01	8.69E-02	745	3.00	0.72	
14	2038	2.01E+01	8.69E-02	745	3.00	0.72	
15	2039	2.01E+01	8.69E-02	745	3.00	0.72	
16	2040	2.01E+01	8.69E-02	745	3.00	0.72	
17	2041	2.01E+01	8.69E-02	335	1.70	0.73	
18	2042	2.01E+01	8.69E-02	335	1.00	0.73	
19	2043	2.01E+01	8.69E-02	335	1.00	0.73	
20	2044	2.01E+01	8.69E-02	335	1.00	0.73	
21	2045	2.01E+01	8.69E-02	335	1.00	0.73	
22	2046	2.01E+01	8.69E-02	335	1.00	0.73	
23	2047	2.01E+01	8.69E-02	335	1.00	0.73	
24	2048	2.01E+01	8.69E-02	335	1.00	0.73	
25	2049	2.01E+01	8.69E-02	335	1.00	0.73	
26	2050	2.01E+01	8.69E-02	335	1.00	0.73	
27	2051	2.01E+01	8.69E-02	335	1.00	0.73	
28	2052	2.01E+01	8.69E-02	335	1.00	0.73	
29	2053	2.01E+01	8.69E-02	335	1.00	0.73	
30	2054	2.01E+01	8.69E-02	335	1.00	0.73	

0.30	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.01	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL	
2,100	Acute Reference Exposure Level (ug/m3) for HCL	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	HCL-Stage 1
Source:	Scrubber
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		6.03E-01	2.61E-03	361	10.0	0.85	
1	2025	6.03E-01	2.61E-03	1,090	10.0	0.85	
2	2026	6.03E-01	2.61E-03	1,090	10.0	0.85	
3	2027	6.03E-01	2.61E-03	745	3.00	0.72	
4	2028	6.03E-01	2.61E-03	745	3.00	0.72	
5	2029	6.03E-01	2.61E-03	745	3.00	0.72	
6	2030	6.03E-01	2.61E-03	745	3.00	0.72	
7	2031	6.03E-01	2.61E-03	745	3.00	0.72	
8	2032	6.03E-01	2.61E-03	745	3.00	0.72	
9	2033	6.03E-01	2.61E-03	745	3.00	0.72	
10	2034	6.03E-01	2.61E-03	745	3.00	0.72	
11	2035	6.03E-01	2.61E-03	745	3.00	0.72	
12	2036	6.03E-01	2.61E-03	745	3.00	0.72	
13	2037	6.03E-01	2.61E-03	745	3.00	0.72	
14	2038	6.03E-01	2.61E-03	745	3.00	0.72	
15	2039	6.03E-01	2.61E-03	745	3.00	0.72	
16	2040	6.03E-01	2.61E-03	745	3.00	0.72	
17	2041	6.03E-01	2.61E-03	335	1.70	0.73	
18	2042	6.03E-01	2.61E-03	335	1.00	0.73	
19	2043	6.03E-01	2.61E-03	335	1.00	0.73	
20	2044	6.03E-01	2.61E-03	335	1.00	0.73	
21	2045	6.03E-01	2.61E-03	335	1.00	0.73	
22	2046	6.03E-01	2.61E-03	335	1.00	0.73	
23	2047	6.03E-01	2.61E-03	335	1.00	0.73	
24	2048	6.03E-01	2.61E-03	335	1.00	0.73	
25	2049	6.03E-01	2.61E-03	335	1.00	0.73	
26	2050	6.03E-01	2.61E-03	335	1.00	0.73	
27	2051	6.03E-01	2.61E-03	335	1.00	0.73	
28	2052	6.03E-01	2.61E-03	335	1.00	0.73	
29	2053	6.03E-01	2.61E-03	335	1.00	0.73	
30	2054	6.03E-01	2.61E-03	335	1.00	0.73	

0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL	
2,100	Acute Reference Exposure Level (ug/m3) for HCL	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
861	95th Percentile Daily Breathing Rates (L/kg-day)	2<9 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
290	95th Percentile Daily Breathing Rates (L/kg-day)	30<70 Years
0.85	fraction of t	0<2 Years
0.72	fraction of t	2<16 Years
0.73	fraction of t	16<70 Years

Project:	Pittsburg Iron Salts Plant
Date:	3/6/2025
Condition:	Operation
Receptor:	Existing Residence
Pollutant:	HCL-Stage 2
Source:	Scrubber
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
Third Trimester		6.03E-05	2.61E-07	361	10.0	0.85	
1	2025	6.03E-05	2.61E-07	1,090	10.0	0.85	
2	2026	6.03E-05	2.61E-07	1,090	10.0	0.85	
3	2027	6.03E-05	2.61E-07	745	3.00	0.72	
4	2028	6.03E-05	2.61E-07	745	3.00	0.72	
5	2029	6.03E-05	2.61E-07	745	3.00	0.72	
6	2030	6.03E-05	2.61E-07	745	3.00	0.72	
7	2031	6.03E-05	2.61E-07	745	3.00	0.72	
8	2032	6.03E-05	2.61E-07	745	3.00	0.72	
9	2033	6.03E-05	2.61E-07	745	3.00	0.72	
10	2034	6.03E-05	2.61E-07	745	3.00	0.72	
11	2035	6.03E-05	2.61E-07	745	3.00	0.72	
12	2036	6.03E-05	2.61E-07	745	3.00	0.72	
13	2037	6.03E-05	2.61E-07	745	3.00	0.72	
14	2038	6.03E-05	2.61E-07	745	3.00	0.72	
15	2039	6.03E-05	2.61E-07	745	3.00	0.72	
16	2040	6.03E-05	2.61E-07	745	3.00	0.72	
17	2041	6.03E-05	2.61E-07	335	1.70	0.73	
18	2042	6.03E-05	2.61E-07	335	1.00	0.73	
19	2043	6.03E-05	2.61E-07	335	1.00	0.73	
20	2044	6.03E-05	2.61E-07	335	1.00	0.73	
21	2045	6.03E-05	2.61E-07	335	1.00	0.73	
22	2046	6.03E-05	2.61E-07	335	1.00	0.73	
23	2047	6.03E-05	2.61E-07	335	1.00	0.73	
24	2048	6.03E-05	2.61E-07	335	1.00	0.73	
25	2049	6.03E-05	2.61E-07	335	1.00	0.73	
26	2050	6.03E-05	2.61E-07	335	1.00	0.73	
27	2051	6.03E-05	2.61E-07	335	1.00	0.73	
28	2052	6.03E-05	2.61E-07	335	1.00	0.73	
29	2053	6.03E-05	2.61E-07	335	1.00	0.73	
30	2054	6.03E-05	2.61E-07	335	1.00	0.73	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

300	Chronic Reference Exposure Level (ug/m3) for Chloroform
150	Acute Reference Exposure Level (ug/m3) for Chloroform
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Existing School
Pollutant:	Chloroform
Source:	Cooling Tower
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour Chloroform Concentration (ug/m3)	Annual Chloroform Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	7.38E-03	1.62E-05	581	3.00	1.00	
2	2026	7.38E-03	1.62E-05	581	3.00	1.00	
3	2027	7.38E-03	1.62E-05	581	3.00	1.00	
4	2028	7.38E-03	1.62E-05	581	3.00	1.00	
5	2029	7.38E-03	1.62E-05	581	3.00	1.00	
6	2030	7.38E-03	1.62E-05	581	3.00	1.00	
7	2031	7.38E-03	1.62E-05	581	3.00	1.00	
8	2032	7.38E-03	1.62E-05	581	3.00	1.00	
9	2033	7.38E-03	1.62E-05	581	3.00	1.00	
10	2034	7.38E-03	1.62E-05	581	3.00	1.00	
11	2035	7.38E-03	1.62E-05	581	3.00	1.00	
12	2036	7.38E-03	1.62E-05	581	3.00	1.00	
13	2037	7.38E-03	1.62E-05	581	3.00	1.00	
14	2038	7.38E-03	1.62E-05	581	3.00	1.00	
15	2039	7.38E-03	1.62E-05	581	3.00	1.00	
16	2040	7.38E-03	1.62E-05	581	3.00	1.00	
17	2041	7.38E-03	1.62E-05	581	3.00	1.00	
18	2042	7.38E-03	1.62E-05	581	3.00	1.00	
19	2043	7.38E-03	1.62E-05	581	3.00	1.00	
20	2044	7.38E-03	1.62E-05	581	3.00	1.00	
21	2045	7.38E-03	1.62E-05	581	3.00	1.00	
22	2046	7.38E-03	1.62E-05	581	3.00	1.00	
23	2047	7.38E-03	1.62E-05	581	3.00	1.00	
24	2048	7.38E-03	1.62E-05	581	3.00	1.00	
25	2049	7.38E-03	1.62E-05	581	3.00	1.00	
26	2050	7.38E-03	1.62E-05	581	3.00	1.00	
27	2051	7.38E-03	1.62E-05	581	3.00	1.00	
28	2052	7.38E-03	1.62E-05	581	3.00	1.00	
29	2053	7.38E-03	1.62E-05	581	3.00	1.00	
30	2054	7.38E-03	1.62E-05	581	3.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Existing School
Pollutant:	HCL-Uncontrolled
Source:	Scrubber
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	1.62E+01	5.36E-02	581	3.00	1.00	
2	2026	1.62E+01	5.36E-02	581	3.00	1.00	
3	2027	1.62E+01	5.36E-02	581	3.00	1.00	
4	2028	1.62E+01	5.36E-02	581	3.00	1.00	
5	2029	1.62E+01	5.36E-02	581	3.00	1.00	
6	2030	1.62E+01	5.36E-02	581	3.00	1.00	
7	2031	1.62E+01	5.36E-02	581	3.00	1.00	
8	2032	1.62E+01	5.36E-02	581	3.00	1.00	
9	2033	1.62E+01	5.36E-02	581	3.00	1.00	
10	2034	1.62E+01	5.36E-02	581	3.00	1.00	
11	2035	1.62E+01	5.36E-02	581	3.00	1.00	
12	2036	1.62E+01	5.36E-02	581	3.00	1.00	
13	2037	1.62E+01	5.36E-02	581	3.00	1.00	
14	2038	1.62E+01	5.36E-02	581	3.00	1.00	
15	2039	1.62E+01	5.36E-02	581	3.00	1.00	
16	2040	1.62E+01	5.36E-02	581	3.00	1.00	
17	2041	1.62E+01	5.36E-02	581	3.00	1.00	
18	2042	1.62E+01	5.36E-02	581	3.00	1.00	
19	2043	1.62E+01	5.36E-02	581	3.00	1.00	
20	2044	1.62E+01	5.36E-02	581	3.00	1.00	
21	2045	1.62E+01	5.36E-02	581	3.00	1.00	
22	2046	1.62E+01	5.36E-02	581	3.00	1.00	
23	2047	1.62E+01	5.36E-02	581	3.00	1.00	
24	2048	1.62E+01	5.36E-02	581	3.00	1.00	
25	2049	1.62E+01	5.36E-02	581	3.00	1.00	
26	2050	1.62E+01	5.36E-02	581	3.00	1.00	
27	2051	1.62E+01	5.36E-02	581	3.00	1.00	
28	2052	1.62E+01	5.36E-02	581	3.00	1.00	
29	2053	1.62E+01	5.36E-02	581	3.00	1.00	
30	2054	1.62E+01	5.36E-02	581	3.00	1.00	

0.18	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.01	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Existing School
Pollutant:	HCL-Stage 1
Source:	Scrubber
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	4.86E-01	1.61E-03	581	3.00	1.00	
2	2026	4.86E-01	1.61E-03	581	3.00	1.00	
3	2027	4.86E-01	1.61E-03	581	3.00	1.00	
4	2028	4.86E-01	1.61E-03	581	3.00	1.00	
5	2029	4.86E-01	1.61E-03	581	3.00	1.00	
6	2030	4.86E-01	1.61E-03	581	3.00	1.00	
7	2031	4.86E-01	1.61E-03	581	3.00	1.00	
8	2032	4.86E-01	1.61E-03	581	3.00	1.00	
9	2033	4.86E-01	1.61E-03	581	3.00	1.00	
10	2034	4.86E-01	1.61E-03	581	3.00	1.00	
11	2035	4.86E-01	1.61E-03	581	3.00	1.00	
12	2036	4.86E-01	1.61E-03	581	3.00	1.00	
13	2037	4.86E-01	1.61E-03	581	3.00	1.00	
14	2038	4.86E-01	1.61E-03	581	3.00	1.00	
15	2039	4.86E-01	1.61E-03	581	3.00	1.00	
16	2040	4.86E-01	1.61E-03	581	3.00	1.00	
17	2041	4.86E-01	1.61E-03	581	3.00	1.00	
18	2042	4.86E-01	1.61E-03	581	3.00	1.00	
19	2043	4.86E-01	1.61E-03	581	3.00	1.00	
20	2044	4.86E-01	1.61E-03	581	3.00	1.00	
21	2045	4.86E-01	1.61E-03	581	3.00	1.00	
22	2046	4.86E-01	1.61E-03	581	3.00	1.00	
23	2047	4.86E-01	1.61E-03	581	3.00	1.00	
24	2048	4.86E-01	1.61E-03	581	3.00	1.00	
25	2049	4.86E-01	1.61E-03	581	3.00	1.00	
26	2050	4.86E-01	1.61E-03	581	3.00	1.00	
27	2051	4.86E-01	1.61E-03	581	3.00	1.00	
28	2052	4.86E-01	1.61E-03	581	3.00	1.00	
29	2053	4.86E-01	1.61E-03	581	3.00	1.00	
30	2054	4.86E-01	1.61E-03	581	3.00	1.00	

0.01	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
180	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Existing School
Pollutant:	HCL-Stage 2
Source:	Scrubber
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at school	Cancer Risk
1	2025	4.86E-05	1.61E-07	581	3.00	1.00	
2	2026	4.86E-05	1.61E-07	581	3.00	1.00	
3	2027	4.86E-05	1.61E-07	581	3.00	1.00	
4	2028	4.86E-05	1.61E-07	581	3.00	1.00	
5	2029	4.86E-05	1.61E-07	581	3.00	1.00	
6	2030	4.86E-05	1.61E-07	581	3.00	1.00	
7	2031	4.86E-05	1.61E-07	581	3.00	1.00	
8	2032	4.86E-05	1.61E-07	581	3.00	1.00	
9	2033	4.86E-05	1.61E-07	581	3.00	1.00	
10	2034	4.86E-05	1.61E-07	581	3.00	1.00	
11	2035	4.86E-05	1.61E-07	581	3.00	1.00	
12	2036	4.86E-05	1.61E-07	581	3.00	1.00	
13	2037	4.86E-05	1.61E-07	581	3.00	1.00	
14	2038	4.86E-05	1.61E-07	581	3.00	1.00	
15	2039	4.86E-05	1.61E-07	581	3.00	1.00	
16	2040	4.86E-05	1.61E-07	581	3.00	1.00	
17	2041	4.86E-05	1.61E-07	581	3.00	1.00	
18	2042	4.86E-05	1.61E-07	581	3.00	1.00	
19	2043	4.86E-05	1.61E-07	581	3.00	1.00	
20	2044	4.86E-05	1.61E-07	581	3.00	1.00	
21	2045	4.86E-05	1.61E-07	581	3.00	1.00	
22	2046	4.86E-05	1.61E-07	581	3.00	1.00	
23	2047	4.86E-05	1.61E-07	581	3.00	1.00	
24	2048	4.86E-05	1.61E-07	581	3.00	1.00	
25	2049	4.86E-05	1.61E-07	581	3.00	1.00	
26	2050	4.86E-05	1.61E-07	581	3.00	1.00	
27	2051	4.86E-05	1.61E-07	581	3.00	1.00	
28	2052	4.86E-05	1.61E-07	581	3.00	1.00	
29	2053	4.86E-05	1.61E-07	581	3.00	1.00	
30	2054	4.86E-05	1.61E-07	581	3.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

300	Chronic Reference Exposure Level (ug/m3) for Chloroform
150	Acute Reference Exposure Level (ug/m3) for Chloroform
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	Chloroform
Source:	Cooling Tower
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour Chloroform Concentration (ug/m3)	Annual Chloroform Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	5.33E-02	1.38E-03	230	1.00	1.00	
2	2026	5.33E-02	1.38E-03	230	1.00	1.00	
3	2027	5.33E-02	1.38E-03	230	1.00	1.00	
4	2028	5.33E-02	1.38E-03	230	1.00	1.00	
5	2029	5.33E-02	1.38E-03	230	1.00	1.00	
6	2030	5.33E-02	1.38E-03	230	1.00	1.00	
7	2031	5.33E-02	1.38E-03	230	1.00	1.00	
8	2032	5.33E-02	1.38E-03	230	1.00	1.00	
9	2033	5.33E-02	1.38E-03	230	1.00	1.00	
10	2034	5.33E-02	1.38E-03	230	1.00	1.00	
11	2035	5.33E-02	1.38E-03	230	1.00	1.00	
12	2036	5.33E-02	1.38E-03	230	1.00	1.00	
13	2037	5.33E-02	1.38E-03	230	1.00	1.00	
14	2038	5.33E-02	1.38E-03	230	1.00	1.00	
15	2039	5.33E-02	1.38E-03	230	1.00	1.00	
16	2040	5.33E-02	1.38E-03	230	1.00	1.00	
17	2041	5.33E-02	1.38E-03	230	1.00	1.00	
18	2042	5.33E-02	1.38E-03	230	1.00	1.00	
19	2043	5.33E-02	1.38E-03	230	1.00	1.00	
20	2044	5.33E-02	1.38E-03	230	1.00	1.00	
21	2045	5.33E-02	1.38E-03	230	1.00	1.00	
22	2046	5.33E-02	1.38E-03	230	1.00	1.00	
23	2047	5.33E-02	1.38E-03	230	1.00	1.00	
24	2048	5.33E-02	1.38E-03	230	1.00	1.00	
25	2049	5.33E-02	1.38E-03	230	1.00	1.00	
26	2050	5.33E-02	1.38E-03	230	1.00	1.00	
27	2051	5.33E-02	1.38E-03	230	1.00	1.00	
28	2052	5.33E-02	1.38E-03	230	1.00	1.00	
29	2053	5.33E-02	1.38E-03	230	1.00	1.00	
30	2054	5.33E-02	1.38E-03	230	1.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	HCL-Uncontrolled
Source:	Scrubber
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	1.17E+02	5.12E+00	230	1.00	1.00	
2	2026	1.17E+02	5.12E+00	230	1.00	1.00	
3	2027	1.17E+02	5.12E+00	230	1.00	1.00	
4	2028	1.17E+02	5.12E+00	230	1.00	1.00	
5	2029	1.17E+02	5.12E+00	230	1.00	1.00	
6	2030	1.17E+02	5.12E+00	230	1.00	1.00	
7	2031	1.17E+02	5.12E+00	230	1.00	1.00	
8	2032	1.17E+02	5.12E+00	230	1.00	1.00	
9	2033	1.17E+02	5.12E+00	230	1.00	1.00	
10	2034	1.17E+02	5.12E+00	230	1.00	1.00	
11	2035	1.17E+02	5.12E+00	230	1.00	1.00	
12	2036	1.17E+02	5.12E+00	230	1.00	1.00	
13	2037	1.17E+02	5.12E+00	230	1.00	1.00	
14	2038	1.17E+02	5.12E+00	230	1.00	1.00	
15	2039	1.17E+02	5.12E+00	230	1.00	1.00	
16	2040	1.17E+02	5.12E+00	230	1.00	1.00	
17	2041	1.17E+02	5.12E+00	230	1.00	1.00	
18	2042	1.17E+02	5.12E+00	230	1.00	1.00	
19	2043	1.17E+02	5.12E+00	230	1.00	1.00	
20	2044	1.17E+02	5.12E+00	230	1.00	1.00	
21	2045	1.17E+02	5.12E+00	230	1.00	1.00	
22	2046	1.17E+02	5.12E+00	230	1.00	1.00	
23	2047	1.17E+02	5.12E+00	230	1.00	1.00	
24	2048	1.17E+02	5.12E+00	230	1.00	1.00	
25	2049	1.17E+02	5.12E+00	230	1.00	1.00	
26	2050	1.17E+02	5.12E+00	230	1.00	1.00	
27	2051	1.17E+02	5.12E+00	230	1.00	1.00	
28	2052	1.17E+02	5.12E+00	230	1.00	1.00	
29	2053	1.17E+02	5.12E+00	230	1.00	1.00	
30	2054	1.17E+02	5.12E+00	230	1.00	1.00	

17.08	Chronic Hazard Impact
1	Significance Threshold
Yes	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.06	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	HCL-Stage 1
Source:	Scrubber
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	3.51E+00	1.54E-01	230	1.00	1.00	
2	2026	3.51E+00	1.54E-01	230	1.00	1.00	
3	2027	3.51E+00	1.54E-01	230	1.00	1.00	
4	2028	3.51E+00	1.54E-01	230	1.00	1.00	
5	2029	3.51E+00	1.54E-01	230	1.00	1.00	
6	2030	3.51E+00	1.54E-01	230	1.00	1.00	
7	2031	3.51E+00	1.54E-01	230	1.00	1.00	
8	2032	3.51E+00	1.54E-01	230	1.00	1.00	
9	2033	3.51E+00	1.54E-01	230	1.00	1.00	
10	2034	3.51E+00	1.54E-01	230	1.00	1.00	
11	2035	3.51E+00	1.54E-01	230	1.00	1.00	
12	2036	3.51E+00	1.54E-01	230	1.00	1.00	
13	2037	3.51E+00	1.54E-01	230	1.00	1.00	
14	2038	3.51E+00	1.54E-01	230	1.00	1.00	
15	2039	3.51E+00	1.54E-01	230	1.00	1.00	
16	2040	3.51E+00	1.54E-01	230	1.00	1.00	
17	2041	3.51E+00	1.54E-01	230	1.00	1.00	
18	2042	3.51E+00	1.54E-01	230	1.00	1.00	
19	2043	3.51E+00	1.54E-01	230	1.00	1.00	
20	2044	3.51E+00	1.54E-01	230	1.00	1.00	
21	2045	3.51E+00	1.54E-01	230	1.00	1.00	
22	2046	3.51E+00	1.54E-01	230	1.00	1.00	
23	2047	3.51E+00	1.54E-01	230	1.00	1.00	
24	2048	3.51E+00	1.54E-01	230	1.00	1.00	
25	2049	3.51E+00	1.54E-01	230	1.00	1.00	
26	2050	3.51E+00	1.54E-01	230	1.00	1.00	
27	2051	3.51E+00	1.54E-01	230	1.00	1.00	
28	2052	3.51E+00	1.54E-01	230	1.00	1.00	
29	2053	3.51E+00	1.54E-01	230	1.00	1.00	
30	2054	3.51E+00	1.54E-01	230	1.00	1.00	

0.51	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Health Risk Assessment Assumptions

9	Chronic Reference Exposure Level (ug/m3) for HCL
2,100	Acute Reference Exposure Level (ug/m3) for HCL
250	days per year
25,550	days per lifetime

Project:	Pittsburg Iron Salts Plant
Date:	2/28/2025
Condition:	Operation
Receptor:	Offsite Worker
Pollutant:	HCL-Stage 2
Source:	Scrubber
Meteorological:	Dow

Exposure Year	Calender Year	1-Hour HCL Concentration (ug/m3)	Annual HCL Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at worker	Cancer Risk
1	2025	3.51E-04	1.54E-05	230	1.00	1.00	
2	2026	3.51E-04	1.54E-05	230	1.00	1.00	
3	2027	3.51E-04	1.54E-05	230	1.00	1.00	
4	2028	3.51E-04	1.54E-05	230	1.00	1.00	
5	2029	3.51E-04	1.54E-05	230	1.00	1.00	
6	2030	3.51E-04	1.54E-05	230	1.00	1.00	
7	2031	3.51E-04	1.54E-05	230	1.00	1.00	
8	2032	3.51E-04	1.54E-05	230	1.00	1.00	
9	2033	3.51E-04	1.54E-05	230	1.00	1.00	
10	2034	3.51E-04	1.54E-05	230	1.00	1.00	
11	2035	3.51E-04	1.54E-05	230	1.00	1.00	
12	2036	3.51E-04	1.54E-05	230	1.00	1.00	
13	2037	3.51E-04	1.54E-05	230	1.00	1.00	
14	2038	3.51E-04	1.54E-05	230	1.00	1.00	
15	2039	3.51E-04	1.54E-05	230	1.00	1.00	
16	2040	3.51E-04	1.54E-05	230	1.00	1.00	
17	2041	3.51E-04	1.54E-05	230	1.00	1.00	
18	2042	3.51E-04	1.54E-05	230	1.00	1.00	
19	2043	3.51E-04	1.54E-05	230	1.00	1.00	
20	2044	3.51E-04	1.54E-05	230	1.00	1.00	
21	2045	3.51E-04	1.54E-05	230	1.00	1.00	
22	2046	3.51E-04	1.54E-05	230	1.00	1.00	
23	2047	3.51E-04	1.54E-05	230	1.00	1.00	
24	2048	3.51E-04	1.54E-05	230	1.00	1.00	
25	2049	3.51E-04	1.54E-05	230	1.00	1.00	
26	2050	3.51E-04	1.54E-05	230	1.00	1.00	
27	2051	3.51E-04	1.54E-05	230	1.00	1.00	
28	2052	3.51E-04	1.54E-05	230	1.00	1.00	
29	2053	3.51E-04	1.54E-05	230	1.00	1.00	
30	2054	3.51E-04	1.54E-05	230	1.00	1.00	

0.00	Chronic Hazard Impact
1	Significance Threshold
No	Significant?
	Cancer Risk (Child)
10	Significance Threshold
No	Significant?
	Cancer Risk (Adult)
10	Significance Threshold
No	Significant?
0.00	Acute Hazard Impact
1	Significance Threshold
No	Significant?

Control Pathway

Dispersion Options

Titles

C:\Users\MikeRatte\Documents\Projects\Pittsburg Iron Salts Plant\Air

Dispersion Options

- [x] Regulatory Default
- [ ] Non-Default Options

Dispersion Coefficient

Rural

Output Type

- [x] Concentration
- [ ] Total Deposition (Dry & Wet)
- [ ] Dry Deposition
- [ ] Wet Deposition

Plume Depletion

- [ ] Dry Removal
- [ ] Wet Removal

Output Warnings

- [ ] No Output Warnings
- [ ] Non-fatal Warnings for Non-sequential Met Data

Pollutant / Averaging Time / Terrain Options

Pollutant Type

OTHER - DPM

Averaging Time Options

Hours

1	2	3	4	6	8	12	24
■	☐	☐	☐	☐	☐	☐	☐

- [ ] Month
- [x] Period
- [ ] Annual

Exponential Decay

Option not available

Terrain Height Options

- [ ] Flat
- [x] Elevated

SO: Meters
RE: Meters
TG: Meters

Flagpole Receptors

- [x] Yes
- [ ] No

Default Height = 1.80 m

Control Pathway

Optional Files

Re-Start File	Init File	Multi-Year Analyses	Event Input File	Error Listing File
☐	☐	☐	☐	■

Detailed Error Listing File

Filename: AERMOD.err

Source Pathway - Source Inputs

Point Sources

Source Type	Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation (Optional)	Release Height [m]	Emission Rate [g/s]	Gas Exit Temp. [K]	Gas Exit Velocity [m/s]	Stack Inside Diameter [m]
POINT	COOL	600626.27	4209223.83	1.87	3.20	1.00000	308.15	11.30	3.77
POINT	SCRUBBER	600631.20	4209229.04	1.81	6.10	1.00000	333.15	11.60	0.81

Source Pathway - Source Inputs

Polygon Area Sources

Source Type: AREA POLY

Source: DPM

Base Elevation (Optional)	Release Height [m]	Emission Rate [g/ (s-m^2)]	Initial Vertical Dim. [m]	Number of Vertices (or sides)	X Coordinate for Vertices [m]	Y Coordinate for Vertices [m]
1.06	0.93	0.00018	1.26	15	600634.64	4209319.80
		0.00018			600645.68	4209316.49
		0.00018			600647.75	4209322.38
		0.00018			600652.65	4209322.77
		0.00018			600660.87	4209310.70
		0.00018			600663.22	4209305.08
		0.00018			600661.96	4209293.00
		0.00018			600660.02	4209277.75
		0.00018			600658.38	4209261.34
		0.00018			600653.42	4209214.46
		0.00018			600651.24	4209206.14
		0.00018			600642.51	4209174.35
		0.00018			600605.79	4209184.77
		0.00018			600615.97	4209215.90
		0.00018			600603.72	4209219.54

Source Pathway - Source Inputs

Source Type: AREA POLY
Source: PM2.5

Base Elevation (Optional)	Release Height [m]	Emission Rate [g/ (s-m^2)]	Initial Vertical Dim. [m]	Number of Vertices (or sides)	X Coordinate for Vertices [m]	Y Coordinate for Vertices [m]
1.06	0.00	0.00018	0.93	15	600634.64	4209319.80
		0.00018			600645.68	4209316.49
		0.00018			600647.75	4209322.38
		0.00018			600652.65	4209322.77
		0.00018			600660.87	4209310.70
		0.00018			600663.22	4209305.08
		0.00018			600661.96	4209293.00
		0.00018			600660.02	4209277.75
		0.00018			600658.38	4209261.34
		0.00018			600653.42	4209214.46
		0.00018			600651.24	4209206.14
		0.00018			600642.51	4209174.35
		0.00018			600605.79	4209184.77
		0.00018			600615.97	4209215.90
		0.00018			600603.72	4209219.54

Source Pathway - Source Inputs

Line Volume Sources

Source Type: LINE VOLUME

Source: SLINE1

Length of Side [m]	Emission Rate [g/ s]	Building Height [m]	X Coordinate for Points [m]	Y Coordinate for points [m]	Base Elevation [m]	Release Height [m]
3.05	1.00000		600654.41	4209215.29	1.98	0.00
			600597.41	4209003.57	3.00	0.00
			600551.26	4209009.68	3.14	0.00
			600487.48	4208979.82	3.33	0.00
			600439.30	4208995.43	3.13	0.00
			600250.65	4208417.95	7.44	0.00
			600192.29	4208240.84	9.11	0.00
			600163.79	4208196.05	9.94	0.00
			600068.79	4208099.69	10.02	0.00
			599879.76	4207921.82	12.51	0.00
			599777.20	4207862.45	12.68	0.00
			599550.49	4207779.68	14.10	0.00

Source Pathway - Source Inputs

Volume Sources Generated from Line Sources

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000001	600654.01	4209213.82	1.95	0.00	0.00307	3.05		2.84	1.93
	L0000002	600652.43	4209207.93	2.02	0.00	0.00307	3.05		2.84	1.93
	L0000003	600650.84	4209202.04	2.08	0.00	0.00307	3.05		2.84	1.93
	L0000004	600649.26	4209196.16	2.14	0.00	0.00307	3.05		2.84	1.93
	L0000005	600647.67	4209190.27	2.21	0.00	0.00307	3.05		2.84	1.93
	L0000006	600646.09	4209184.39	2.27	0.00	0.00307	3.05		2.84	1.93
	L0000007	600644.50	4209178.50	2.33	0.00	0.00307	3.05		2.84	1.93
	L0000008	600642.92	4209172.61	2.40	0.00	0.00307	3.05		2.84	1.93
	L0000009	600641.33	4209166.73	2.46	0.00	0.00307	3.05		2.84	1.93
	L0000010	600639.75	4209160.84	2.52	0.00	0.00307	3.05		2.84	1.93
	L0000011	600638.17	4209154.95	2.59	0.00	0.00307	3.05		2.84	1.93
	L0000012	600636.58	4209149.07	2.65	0.00	0.00307	3.05		2.84	1.93
	L0000013	600635.00	4209143.18	2.71	0.00	0.00307	3.05		2.84	1.93
	L0000014	600633.41	4209137.29	2.78	0.00	0.00307	3.05		2.84	1.93
	L0000015	600631.83	4209131.41	2.84	0.00	0.00307	3.05		2.84	1.93
	L0000016	600630.24	4209125.52	2.90	0.00	0.00307	3.05		2.84	1.93
	L0000017	600628.66	4209119.64	2.97	0.00	0.00307	3.05		2.84	1.93
	L0000018	600627.07	4209113.75	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000019	600625.49	4209107.86	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000020	600623.90	4209101.98	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000021	600622.32	4209096.09	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000022	600620.73	4209090.20	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000023	600619.15	4209084.32	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000024	600617.56	4209078.43	3.00	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000025	600615.98	4209072.54	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000026	600614.39	4209066.66	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000027	600612.81	4209060.77	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000028	600611.22	4209054.88	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000029	600609.64	4209049.00	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000030	600608.05	4209043.11	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000031	600606.47	4209037.23	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000032	600604.88	4209031.34	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000033	600603.30	4209025.45	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000034	600601.71	4209019.57	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000035	600600.13	4209013.68	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000036	600598.55	4209007.79	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000037	600595.70	4209003.80	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000038	600589.66	4209004.60	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000039	600583.62	4209005.39	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000040	600577.57	4209006.19	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000041	600571.53	4209006.99	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000042	600565.49	4209007.79	3.01	0.00	0.00307	3.05		2.84	1.93
	L0000043	600559.44	4209008.59	3.03	0.00	0.00307	3.05		2.84	1.93
	L0000044	600553.40	4209009.39	3.04	0.00	0.00307	3.05		2.84	1.93
	L0000045	600547.69	4209008.01	3.05	0.00	0.00307	3.05		2.84	1.93
	L0000046	600542.17	4209005.42	3.08	0.00	0.00307	3.05		2.84	1.93
	L0000047	600536.65	4209002.84	3.10	0.00	0.00307	3.05		2.84	1.93
	L0000048	600531.13	4209000.25	3.13	0.00	0.00307	3.05		2.84	1.93
	L0000049	600525.61	4208997.67	3.17	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000050	600520.09	4208995.08	3.21	0.00	0.00307	3.05		2.84	1.93
	L0000051	600514.57	4208992.50	3.25	0.00	0.00307	3.05		2.84	1.93
	L0000052	600509.05	4208989.91	3.30	0.00	0.00307	3.05		2.84	1.93
	L0000053	600503.52	4208987.33	3.35	0.00	0.00307	3.05		2.84	1.93
	L0000054	600498.00	4208984.75	3.41	0.00	0.00307	3.05		2.84	1.93
	L0000055	600492.48	4208982.16	3.44	0.00	0.00307	3.05		2.84	1.93
	L0000056	600486.94	4208979.99	3.46	0.00	0.00307	3.05		2.84	1.93
	L0000057	600481.14	4208981.87	3.44	0.00	0.00307	3.05		2.84	1.93
	L0000058	600475.34	4208983.75	3.42	0.00	0.00307	3.05		2.84	1.93
	L0000059	600469.54	4208985.63	3.40	0.00	0.00307	3.05		2.84	1.93
	L0000060	600463.74	4208987.51	3.37	0.00	0.00307	3.05		2.84	1.93
	L0000061	600457.94	4208989.39	3.35	0.00	0.00307	3.05		2.84	1.93
	L0000062	600452.14	4208991.27	3.33	0.00	0.00307	3.05		2.84	1.93
	L0000063	600446.34	4208993.14	3.31	0.00	0.00307	3.05		2.84	1.93
	L0000064	600440.54	4208995.02	3.29	0.00	0.00307	3.05		2.84	1.93
	L0000065	600437.81	4208990.87	3.33	0.00	0.00307	3.05		2.84	1.93
	L0000066	600435.92	4208985.08	3.40	0.00	0.00307	3.05		2.84	1.93
	L0000067	600434.02	4208979.29	3.46	0.00	0.00307	3.05		2.84	1.93
	L0000068	600432.13	4208973.49	3.52	0.00	0.00307	3.05		2.84	1.93
	L0000069	600430.24	4208967.70	3.58	0.00	0.00307	3.05		2.84	1.93
	L0000070	600428.35	4208961.90	3.65	0.00	0.00307	3.05		2.84	1.93
	L0000071	600426.45	4208956.11	3.71	0.00	0.00307	3.05		2.84	1.93
	L0000072	600424.56	4208950.31	3.77	0.00	0.00307	3.05		2.84	1.93
	L0000073	600422.67	4208944.52	3.83	0.00	0.00307	3.05		2.84	1.93
	L0000074	600420.77	4208938.72	3.90	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000075	600418.88	4208932.93	3.96	0.00	0.00307	3.05		2.84	1.93
	L0000076	600416.99	4208927.13	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000077	600415.09	4208921.34	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000078	600413.20	4208915.54	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000079	600411.31	4208909.75	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000080	600409.42	4208903.95	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000081	600407.52	4208898.16	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000082	600405.63	4208892.37	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000083	600403.74	4208886.57	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000084	600401.84	4208880.78	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000085	600399.95	4208874.98	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000086	600398.06	4208869.19	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000087	600396.16	4208863.39	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000088	600394.27	4208857.60	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000089	600392.38	4208851.80	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000090	600390.49	4208846.01	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000091	600388.59	4208840.21	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000092	600386.70	4208834.42	4.02	0.00	0.00307	3.05		2.84	1.93
	L0000093	600384.81	4208828.62	4.08	0.00	0.00307	3.05		2.84	1.93
	L0000094	600382.91	4208822.83	4.14	0.00	0.00307	3.05		2.84	1.93
	L0000095	600381.02	4208817.04	4.21	0.00	0.00307	3.05		2.84	1.93
	L0000096	600379.13	4208811.24	4.27	0.00	0.00307	3.05		2.84	1.93
	L0000097	600377.24	4208805.45	4.33	0.00	0.00307	3.05		2.84	1.93
	L0000098	600375.34	4208799.65	4.39	0.00	0.00307	3.05		2.84	1.93
	L0000099	600373.45	4208793.86	4.46	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000100	600371.56	4208788.06	4.52	0.00	0.00307	3.05		2.84	1.93
	L0000101	600369.66	4208782.27	4.58	0.00	0.00307	3.05		2.84	1.93
	L0000102	600367.77	4208776.47	4.64	0.00	0.00307	3.05		2.84	1.93
	L0000103	600365.88	4208770.68	4.71	0.00	0.00307	3.05		2.84	1.93
	L0000104	600363.98	4208764.88	4.77	0.00	0.00307	3.05		2.84	1.93
	L0000105	600362.09	4208759.09	4.83	0.00	0.00307	3.05		2.84	1.93
	L0000106	600360.20	4208753.29	4.89	0.00	0.00307	3.05		2.84	1.93
	L0000107	600358.31	4208747.50	4.96	0.00	0.00307	3.05		2.84	1.93
	L0000108	600356.41	4208741.70	5.02	0.00	0.00307	3.05		2.84	1.93
	L0000109	600354.52	4208735.91	5.08	0.00	0.00307	3.05		2.84	1.93
	L0000110	600352.63	4208730.12	5.14	0.00	0.00307	3.05		2.84	1.93
	L0000111	600350.73	4208724.32	5.20	0.00	0.00307	3.05		2.84	1.93
	L0000112	600348.84	4208718.53	5.27	0.00	0.00307	3.05		2.84	1.93
	L0000113	600346.95	4208712.73	5.33	0.00	0.00307	3.05		2.84	1.93
	L0000114	600345.05	4208706.94	5.39	0.00	0.00307	3.05		2.84	1.93
	L0000115	600343.16	4208701.14	5.45	0.00	0.00307	3.05		2.84	1.93
	L0000116	600341.27	4208695.35	5.52	0.00	0.00307	3.05		2.84	1.93
	L0000117	600339.38	4208689.55	5.58	0.00	0.00307	3.05		2.84	1.93
	L0000118	600337.48	4208683.76	5.64	0.00	0.00307	3.05		2.84	1.93
	L0000119	600335.59	4208677.96	5.70	0.00	0.00307	3.05		2.84	1.93
	L0000120	600333.70	4208672.17	5.77	0.00	0.00307	3.05		2.84	1.93
	L0000121	600331.80	4208666.37	5.83	0.00	0.00307	3.05		2.84	1.93
	L0000122	600329.91	4208660.58	5.89	0.00	0.00307	3.05		2.84	1.93
	L0000123	600328.02	4208654.79	5.95	0.00	0.00307	3.05		2.84	1.93
	L0000124	600326.13	4208648.99	6.00	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000125	600324.23	4208643.20	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000126	600322.34	4208637.40	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000127	600320.45	4208631.61	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000128	600318.55	4208625.81	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000129	600316.66	4208620.02	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000130	600314.77	4208614.22	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000131	600312.87	4208608.43	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000132	600310.98	4208602.63	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000133	600309.09	4208596.84	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000134	600307.20	4208591.04	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000135	600305.30	4208585.25	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000136	600303.41	4208579.45	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000137	600301.52	4208573.66	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000138	600299.62	4208567.87	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000139	600297.73	4208562.07	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000140	600295.84	4208556.28	6.01	0.00	0.00307	3.05		2.84	1.93
	L0000141	600293.94	4208550.48	6.08	0.00	0.00307	3.05		2.84	1.93
	L0000142	600292.05	4208544.69	6.14	0.00	0.00307	3.05		2.84	1.93
	L0000143	600290.16	4208538.89	6.20	0.00	0.00307	3.05		2.84	1.93
	L0000144	600288.27	4208533.10	6.26	0.00	0.00307	3.05		2.84	1.93
	L0000145	600286.37	4208527.30	6.33	0.00	0.00307	3.05		2.84	1.93
	L0000146	600284.48	4208521.51	6.39	0.00	0.00307	3.05		2.84	1.93
	L0000147	600282.59	4208515.71	6.47	0.00	0.00307	3.05		2.84	1.93
	L0000148	600280.69	4208509.92	6.54	0.00	0.00307	3.05		2.84	1.93
	L0000149	600278.80	4208504.12	6.61	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000150	600276.91	4208498.33	6.68	0.00	0.00307	3.05		2.84	1.93
	L0000151	600275.02	4208492.54	6.74	0.00	0.00307	3.05		2.84	1.93
	L0000152	600273.12	4208486.74	6.80	0.00	0.00307	3.05		2.84	1.93
	L0000153	600271.23	4208480.95	6.86	0.00	0.00307	3.05		2.84	1.93
	L0000154	600269.34	4208475.15	6.91	0.00	0.00307	3.05		2.84	1.93
	L0000155	600267.44	4208469.36	6.96	0.00	0.00307	3.05		2.84	1.93
	L0000156	600265.55	4208463.56	7.01	0.00	0.00307	3.05		2.84	1.93
	L0000157	600263.66	4208457.77	7.08	0.00	0.00307	3.05		2.84	1.93
	L0000158	600261.76	4208451.97	7.14	0.00	0.00307	3.05		2.84	1.93
	L0000159	600259.87	4208446.18	7.20	0.00	0.00307	3.05		2.84	1.93
	L0000160	600257.98	4208440.38	7.26	0.00	0.00307	3.05		2.84	1.93
	L0000161	600256.09	4208434.59	7.33	0.00	0.00307	3.05		2.84	1.93
	L0000162	600254.19	4208428.79	7.39	0.00	0.00307	3.05		2.84	1.93
	L0000163	600252.30	4208423.00	7.45	0.00	0.00307	3.05		2.84	1.93
	L0000164	600250.40	4208417.21	7.51	0.00	0.00307	3.05		2.84	1.93
	L0000165	600248.50	4208411.42	7.57	0.00	0.00307	3.05		2.84	1.93
	L0000166	600246.59	4208405.63	7.64	0.00	0.00307	3.05		2.84	1.93
	L0000167	600244.68	4208399.84	7.70	0.00	0.00307	3.05		2.84	1.93
	L0000168	600242.77	4208394.05	7.76	0.00	0.00307	3.05		2.84	1.93
	L0000169	600240.87	4208388.26	7.82	0.00	0.00307	3.05		2.84	1.93
	L0000170	600238.96	4208382.47	7.89	0.00	0.00307	3.05		2.84	1.93
	L0000171	600237.05	4208376.68	7.95	0.00	0.00307	3.05		2.84	1.93
	L0000172	600235.14	4208370.89	8.01	0.00	0.00307	3.05		2.84	1.93
	L0000173	600233.23	4208365.10	8.05	0.00	0.00307	3.05		2.84	1.93
	L0000174	600231.33	4208359.31	8.10	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

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Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000175	600229.42	4208353.52	8.15	0.00	0.00307	3.05		2.84	1.93
	L0000176	600227.51	4208347.73	8.21	0.00	0.00307	3.05		2.84	1.93
	L0000177	600225.60	4208341.94	8.27	0.00	0.00307	3.05		2.84	1.93
	L0000178	600223.70	4208336.15	8.33	0.00	0.00307	3.05		2.84	1.93
	L0000179	600221.79	4208330.36	8.40	0.00	0.00307	3.05		2.84	1.93
	L0000180	600219.88	4208324.57	8.47	0.00	0.00307	3.05		2.84	1.93
	L0000181	600217.97	4208318.78	8.54	0.00	0.00307	3.05		2.84	1.93
	L0000182	600216.07	4208312.99	8.62	0.00	0.00307	3.05		2.84	1.93
	L0000183	600214.16	4208307.20	8.69	0.00	0.00307	3.05		2.84	1.93
	L0000184	600212.25	4208301.41	8.76	0.00	0.00307	3.05		2.84	1.93
	L0000185	600210.34	4208295.62	8.82	0.00	0.00307	3.05		2.84	1.93
	L0000186	600208.43	4208289.83	8.88	0.00	0.00307	3.05		2.84	1.93
	L0000187	600206.53	4208284.04	8.95	0.00	0.00307	3.05		2.84	1.93
	L0000188	600204.62	4208278.25	9.00	0.00	0.00307	3.05		2.84	1.93
	L0000189	600202.71	4208272.46	9.01	0.00	0.00307	3.05		2.84	1.93
	L0000190	600200.80	4208266.67	9.02	0.00	0.00307	3.05		2.84	1.93
	L0000191	600198.90	4208260.88	9.04	0.00	0.00307	3.05		2.84	1.93
	L0000192	600196.99	4208255.09	9.06	0.00	0.00307	3.05		2.84	1.93
	L0000193	600195.08	4208249.30	9.09	0.00	0.00307	3.05		2.84	1.93
	L0000194	600193.17	4208243.51	9.11	0.00	0.00307	3.05		2.84	1.93
	L0000195	600190.53	4208238.07	9.15	0.00	0.00307	3.05		2.84	1.93
	L0000196	600187.26	4208232.93	9.19	0.00	0.00307	3.05		2.84	1.93
	L0000197	600183.98	4208227.78	9.23	0.00	0.00307	3.05		2.84	1.93
	L0000198	600180.71	4208222.64	9.28	0.00	0.00307	3.05		2.84	1.93
	L0000199	600177.44	4208217.50	9.34	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

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SLINE1	L0000200	600174.17	4208212.35	9.40	0.00	0.00307	3.05		2.84	1.93
	L0000201	600170.89	4208207.21	9.47	0.00	0.00307	3.05		2.84	1.93
	L0000202	600167.62	4208202.07	9.54	0.00	0.00307	3.05		2.84	1.93
	L0000203	600164.35	4208196.93	9.61	0.00	0.00307	3.05		2.84	1.93
	L0000204	600160.24	4208192.45	9.70	0.00	0.00307	3.05		2.84	1.93
	L0000205	600155.96	4208188.11	9.79	0.00	0.00307	3.05		2.84	1.93
	L0000206	600151.68	4208183.77	9.87	0.00	0.00307	3.05		2.84	1.93
	L0000207	600147.40	4208179.43	9.93	0.00	0.00307	3.05		2.84	1.93
	L0000208	600143.12	4208175.08	9.99	0.00	0.00307	3.05		2.84	1.93
	L0000209	600138.84	4208170.74	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000210	600134.56	4208166.40	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000211	600130.28	4208162.06	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000212	600126.00	4208157.72	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000213	600121.72	4208153.38	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000214	600117.44	4208149.04	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000215	600113.16	4208144.70	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000216	600108.88	4208140.36	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000217	600104.60	4208136.02	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000218	600100.32	4208131.67	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000219	600096.04	4208127.33	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000220	600091.76	4208122.99	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000221	600087.48	4208118.65	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000222	600083.20	4208114.31	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000223	600078.92	4208109.97	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000224	600074.64	4208105.63	10.00	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

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Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000225	600070.36	4208101.29	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000226	600065.98	4208097.05	10.05	0.00	0.00307	3.05		2.84	1.93
	L0000227	600061.54	4208092.87	10.12	0.00	0.00307	3.05		2.84	1.93
	L0000228	600057.10	4208088.70	10.22	0.00	0.00307	3.05		2.84	1.93
	L0000229	600052.66	4208084.52	10.32	0.00	0.00307	3.05		2.84	1.93
	L0000230	600048.22	4208080.34	10.43	0.00	0.00307	3.05		2.84	1.93
	L0000231	600043.78	4208076.16	10.54	0.00	0.00307	3.05		2.84	1.93
	L0000232	600039.34	4208071.99	10.64	0.00	0.00307	3.05		2.84	1.93
	L0000233	600034.90	4208067.81	10.75	0.00	0.00307	3.05		2.84	1.93
	L0000234	600030.47	4208063.63	10.85	0.00	0.00307	3.05		2.84	1.93
	L0000235	600026.03	4208059.45	10.96	0.00	0.00307	3.05		2.84	1.93
	L0000236	600021.59	4208055.28	11.07	0.00	0.00307	3.05		2.84	1.93
	L0000237	600017.15	4208051.10	11.17	0.00	0.00307	3.05		2.84	1.93
	L0000238	600012.71	4208046.92	11.28	0.00	0.00307	3.05		2.84	1.93
	L0000239	600008.27	4208042.74	11.38	0.00	0.00307	3.05		2.84	1.93
	L0000240	600003.83	4208038.57	11.49	0.00	0.00307	3.05		2.84	1.93
	L0000241	599999.39	4208034.39	11.60	0.00	0.00307	3.05		2.84	1.93
	L0000242	599994.95	4208030.21	11.66	0.00	0.00307	3.05		2.84	1.93
	L0000243	599990.51	4208026.03	11.71	0.00	0.00307	3.05		2.84	1.93
	L0000244	599986.07	4208021.86	11.75	0.00	0.00307	3.05		2.84	1.93
	L0000245	599981.63	4208017.68	11.80	0.00	0.00307	3.05		2.84	1.93
	L0000246	599977.19	4208013.50	11.84	0.00	0.00307	3.05		2.84	1.93
	L0000247	599972.75	4208009.32	11.89	0.00	0.00307	3.05		2.84	1.93
	L0000248	599968.31	4208005.15	11.93	0.00	0.00307	3.05		2.84	1.93
	L0000249	599963.87	4208000.97	11.98	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000250	599959.43	4207996.79	12.01	0.00	0.00307	3.05		2.84	1.93
	L0000251	599954.99	4207992.61	12.04	0.00	0.00307	3.05		2.84	1.93
	L0000252	599950.55	4207988.44	12.07	0.00	0.00307	3.05		2.84	1.93
	L0000253	599946.11	4207984.26	12.11	0.00	0.00307	3.05		2.84	1.93
	L0000254	599941.67	4207980.08	12.15	0.00	0.00307	3.05		2.84	1.93
	L0000255	599937.23	4207975.91	12.20	0.00	0.00307	3.05		2.84	1.93
	L0000256	599932.79	4207971.73	12.26	0.00	0.00307	3.05		2.84	1.93
	L0000257	599928.35	4207967.55	12.32	0.00	0.00307	3.05		2.84	1.93
	L0000258	599923.91	4207963.37	12.36	0.00	0.00307	3.05		2.84	1.93
	L0000259	599919.47	4207959.20	12.34	0.00	0.00307	3.05		2.84	1.93
	L0000260	599915.03	4207955.02	12.32	0.00	0.00307	3.05		2.84	1.93
	L0000261	599910.59	4207950.84	12.31	0.00	0.00307	3.05		2.84	1.93
	L0000262	599906.15	4207946.66	12.29	0.00	0.00307	3.05		2.84	1.93
	L0000263	599901.72	4207942.49	12.27	0.00	0.00307	3.05		2.84	1.93
	L0000264	599897.28	4207938.31	12.26	0.00	0.00307	3.05		2.84	1.93
	L0000265	599892.84	4207934.13	12.24	0.00	0.00307	3.05		2.84	1.93
	L0000266	599888.40	4207929.95	12.22	0.00	0.00307	3.05		2.84	1.93
	L0000267	599883.96	4207925.78	12.20	0.00	0.00307	3.05		2.84	1.93
	L0000268	599879.47	4207921.66	12.19	0.00	0.00307	3.05		2.84	1.93
	L0000269	599874.20	4207918.60	12.15	0.00	0.00307	3.05		2.84	1.93
	L0000270	599868.92	4207915.55	12.11	0.00	0.00307	3.05		2.84	1.93
	L0000271	599863.65	4207912.50	12.07	0.00	0.00307	3.05		2.84	1.93
	L0000272	599858.37	4207909.44	12.03	0.00	0.00307	3.05		2.84	1.93
	L0000273	599853.09	4207906.39	11.99	0.00	0.00307	3.05		2.84	1.93
	L0000274	599847.82	4207903.33	12.03	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000275	599842.54	4207900.28	12.10	0.00	0.00307	3.05		2.84	1.93
	L0000276	599837.27	4207897.22	12.16	0.00	0.00307	3.05		2.84	1.93
	L0000277	599831.99	4207894.17	12.23	0.00	0.00307	3.05		2.84	1.93
	L0000278	599826.72	4207891.12	12.29	0.00	0.00307	3.05		2.84	1.93
	L0000279	599821.44	4207888.06	12.35	0.00	0.00307	3.05		2.84	1.93
	L0000280	599816.16	4207885.01	12.42	0.00	0.00307	3.05		2.84	1.93
	L0000281	599810.89	4207881.95	12.48	0.00	0.00307	3.05		2.84	1.93
	L0000282	599805.61	4207878.90	12.55	0.00	0.00307	3.05		2.84	1.93
	L0000283	599800.34	4207875.84	12.61	0.00	0.00307	3.05		2.84	1.93
	L0000284	599795.06	4207872.79	12.68	0.00	0.00307	3.05		2.84	1.93
	L0000285	599789.79	4207869.74	12.74	0.00	0.00307	3.05		2.84	1.93
	L0000286	599784.51	4207866.68	12.81	0.00	0.00307	3.05		2.84	1.93
	L0000287	599779.23	4207863.63	12.87	0.00	0.00307	3.05		2.84	1.93
	L0000288	599773.68	4207861.16	12.92	0.00	0.00307	3.05		2.84	1.93
	L0000289	599767.96	4207859.07	12.97	0.00	0.00307	3.05		2.84	1.93
	L0000290	599762.23	4207856.98	13.01	0.00	0.00307	3.05		2.84	1.93
	L0000291	599756.50	4207854.89	13.05	0.00	0.00307	3.05		2.84	1.93
	L0000292	599750.78	4207852.80	13.10	0.00	0.00307	3.05		2.84	1.93
	L0000293	599745.05	4207850.71	13.14	0.00	0.00307	3.05		2.84	1.93
	L0000294	599739.32	4207848.62	13.19	0.00	0.00307	3.05		2.84	1.93
	L0000295	599733.60	4207846.53	13.23	0.00	0.00307	3.05		2.84	1.93
	L0000296	599727.87	4207844.44	13.27	0.00	0.00307	3.05		2.84	1.93
	L0000297	599722.15	4207842.35	13.32	0.00	0.00307	3.05		2.84	1.93
	L0000298	599716.42	4207840.26	13.36	0.00	0.00307	3.05		2.84	1.93
	L0000299	599710.69	4207838.17	13.40	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000300	599704.97	4207836.08	13.46	0.00	0.00307	3.05		2.84	1.93
	L0000301	599699.24	4207833.99	13.52	0.00	0.00307	3.05		2.84	1.93
	L0000302	599693.51	4207831.90	13.58	0.00	0.00307	3.05		2.84	1.93
	L0000303	599687.79	4207829.81	13.64	0.00	0.00307	3.05		2.84	1.93
	L0000304	599682.06	4207827.72	13.69	0.00	0.00307	3.05		2.84	1.93
	L0000305	599676.34	4207825.62	13.74	0.00	0.00307	3.05		2.84	1.93
	L0000306	599670.61	4207823.53	13.78	0.00	0.00307	3.05		2.84	1.93
	L0000307	599664.88	4207821.44	13.83	0.00	0.00307	3.05		2.84	1.93
	L0000308	599659.16	4207819.35	13.86	0.00	0.00307	3.05		2.84	1.93
	L0000309	599653.43	4207817.26	13.90	0.00	0.00307	3.05		2.84	1.93
	L0000310	599647.70	4207815.17	13.93	0.00	0.00307	3.05		2.84	1.93
	L0000311	599641.98	4207813.08	13.96	0.00	0.00307	3.05		2.84	1.93
	L0000312	599636.25	4207810.99	13.99	0.00	0.00307	3.05		2.84	1.93
	L0000313	599630.52	4207808.90	14.01	0.00	0.00307	3.05		2.84	1.93
	L0000314	599624.80	4207806.81	14.03	0.00	0.00307	3.05		2.84	1.93
	L0000315	599619.07	4207804.72	14.05	0.00	0.00307	3.05		2.84	1.93
	L0000316	599613.35	4207802.63	14.07	0.00	0.00307	3.05		2.84	1.93
	L0000317	599607.62	4207800.54	14.10	0.00	0.00307	3.05		2.84	1.93
	L0000318	599601.89	4207798.45	14.12	0.00	0.00307	3.05		2.84	1.93
	L0000319	599596.17	4207796.36	14.14	0.00	0.00307	3.05		2.84	1.93
	L0000320	599590.44	4207794.27	14.16	0.00	0.00307	3.05		2.84	1.93
	L0000321	599584.71	4207792.18	14.18	0.00	0.00307	3.05		2.84	1.93
	L0000322	599578.99	4207790.09	14.20	0.00	0.00307	3.05		2.84	1.93
	L0000323	599573.26	4207787.99	14.23	0.00	0.00307	3.05		2.84	1.93
	L0000324	599567.54	4207785.90	14.25	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000325	599561.81	4207783.81	14.27	0.00	0.00307	3.05		2.84	1.93
	L0000326	599556.08	4207781.72	14.24	0.00	0.00307	3.05		2.84	1.93

Meteorology Pathway

Met Input Data

Surface Met Data

Filename: ..\..\Met Data\Dow - New\AERMOD.SFC
Format Type: Default AERMET format

Profile Met Data

Filename: ..\..\Met Data\Dow - New\AERMOD.PFL
Format Type: Default AERMET format

Wind Speed

☐ Wind Speeds are Vector Mean (Not Scalar Means)

Wind Direction

Rotation Adjustment [deg]:

Potential Temperature Profile

Base Elevation above MSL (for Primary Met Tower): 3.00 [m]

Meteorological Station Data

Stations	Station No.	Year	X Coordinate [m]	Y Coordinate [m]	Station Name
Surface		2013			OAKLAND/WSO AP
Upper Air		2013			
On-Site		2013			

Data Period

Data Period to Process

Start Date: 1/1/2013 Start Hour: 1 End Date: 12/31/2017 End Hour: 24

Wind Speed Categories

Stability Category	Wind Speed [m/s]	Stability Category	Wind Speed [m/s]
A	1.54	D	8.23
B	3.09	E	10.8
C	5.14	F	No Upper Bound

Output Pathway

Tabular Printed Outputs

Short Term Averaging Period	RECTABLE Highest Values Table										MAXTABLE Maximum Values Table	DAYTABLE Daily Values Table
	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th		
1	■	☐	☐	☐	☐	☐	☐	☐	☐	☐		No

Contour Plot Files (PLOTFILE)

Path for PLOTFILES: \AERMOD.AD

Averaging Period	Source Group ID	High Value	File Name
1	COOL	1st	01H1G001.PLT
1	DPM	1st	01H1G002.PLT
1	PM2.5	1st	01H1G003.PLT
1	SCRUBBER	1st	01H1G004.PLT
1	SLINE1	1st	01H1G005.PLT
Period	COOL	N/A	PE00G001.PLT
Period	DPM	N/A	PE00G002.PLT
Period	PM2.5	N/A	PE00G003.PLT
Period	SCRUBBER	N/A	PE00G004.PLT
Period	SLINE1	N/A	PE00G005.PLT

Results Summary

C:\Users\MikeRatte\Documents\Projects\Pittsburg Iron Salts Plant\Air

DPM - Concentration - Source Group: COOL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	354.06970	ug/m^3	600500.00	4209175.00	2.35	1.80	2.35	10/3/2014, 18
PERIOD		9.15402	ug/m^3	600696.11	4209219.83	1.89	1.80	1.89	

DPM - Concentration - Source Group: DPM

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	17575.66501	ug/m^3	600700.00	4209375.00	1.00	1.80	1.00	12/27/2017, 9
PERIOD		26.47985	ug/m^3	600696.11	4209219.83	1.89	1.80	1.89	

DPM - Concentration - Source Group: PM2.5

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	19385.23058	ug/m^3	600750.00	4209475.00	0.14	1.80	0.14	12/27/2017, 9
PERIOD		26.69053	ug/m^3	600696.11	4209219.83	1.89	1.80	1.89	

DPM - Concentration - Source Group: SCRUBBER

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	655.13834	ug/m^3	600500.00	4209225.00	2.00	1.80	2.00	9/2/2017, 19
PERIOD		28.68274	ug/m^3	600696.11	4209219.83	1.89	1.80	1.89	

Results Summary

C:\Users\MikeRatte\Documents\Projects\Pittsburg Iron Salts Plant\Air

DPM - Concentration - Source Group: SLINE1

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	1994.25410	ug/m^3	600450.00	4209025.00	3.00	1.80	3.00	12/28/2016, 9
PERIOD		14.27348	ug/m^3	600500.00	4208975.00	3.50	1.80	3.50	

Control Pathway

Dispersion Options

Titles

C:\Users\MikeRatte\Documents\Projects\Pittsburg Iron Salts Plant\Air

Dispersion Options

☑ Regulatory Default ☐ Non-Default Options

Dispersion Coefficient

Rural

Output Type

☑ Concentration
☐ Total Deposition (Dry & Wet)
☐ Dry Deposition
☐ Wet Deposition

Plume Depletion

☐ Dry Removal
☐ Wet Removal

Output Warnings

☐ No Output Warnings
☐ Non-fatal Warnings for Non-sequential Met Data

Pollutant / Averaging Time / Terrain Options

Pollutant Type

OTHER - DPM

Averaging Time Options

Hours: ☑ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 6 ☐ 8 ☐ 12 ☐ 24

☐ Month ☑ Period ☐ Annual

Exponential Decay

Option not available

Terrain Height Options

☐ Flat ☑ Elevated

SO: Meters
RE: Meters
TG: Meters

Flagpole Receptors

☑ Yes ☐ No

Default Height = 1.80 m

Control Pathway

Optional Files

Re-Start File	Init File	Multi-Year Analyses	Event Input File	Error Listing File
☐	☐	☐	☐	■

Detailed Error Listing File

Filename: AERMOD.err

Source Pathway - Source Inputs

Point Sources

Source Type	Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation (Optional)	Release Height [m]	Emission Rate [g/s]	Gas Exit Temp. [K]	Gas Exit Velocity [m/s]	Stack Inside Diameter [m]
POINT	COOL	600626.27	4209223.83	1.87	3.20	1.00000	308.15	11.30	3.77
POINT	SCRUBBER	600631.20	4209229.04	1.81	6.10	1.00000	333.15	11.60	0.81

Source Pathway - Source Inputs

Polygon Area Sources

Source Type: AREA POLY

Source: DPM

Base Elevation (Optional)	Release Height [m]	Emission Rate [g/ (s-m^2)]	Initial Vertical Dim. [m]	Number of Vertices (or sides)	X Coordinate for Vertices [m]	Y Coordinate for Vertices [m]
1.06	0.93	0.00018	1.26	15	600634.64	4209319.80
		0.00018			600645.68	4209316.49
		0.00018			600647.75	4209322.38
		0.00018			600652.65	4209322.77
		0.00018			600660.87	4209310.70
		0.00018			600663.22	4209305.08
		0.00018			600661.96	4209293.00
		0.00018			600660.02	4209277.75
		0.00018			600658.38	4209261.34
		0.00018			600653.42	4209214.46
		0.00018			600651.24	4209206.14
		0.00018			600642.51	4209174.35
		0.00018			600605.79	4209184.77
		0.00018			600615.97	4209215.90
		0.00018			600603.72	4209219.54

Source Pathway - Source Inputs

Source Type: AREA POLY
Source: PM2.5

Base Elevation (Optional)	Release Height [m]	Emission Rate [g/ (s-m^2)]	Initial Vertical Dim. [m]	Number of Vertices (or sides)	X Coordinate for Vertices [m]	Y Coordinate for Vertices [m]
1.06	0.00	0.00018	0.93	15	600634.64	4209319.80
		0.00018			600645.68	4209316.49
		0.00018			600647.75	4209322.38
		0.00018			600652.65	4209322.77
		0.00018			600660.87	4209310.70
		0.00018			600663.22	4209305.08
		0.00018			600661.96	4209293.00
		0.00018			600660.02	4209277.75
		0.00018			600658.38	4209261.34
		0.00018			600653.42	4209214.46
		0.00018			600651.24	4209206.14
		0.00018			600642.51	4209174.35
		0.00018			600605.79	4209184.77
		0.00018			600615.97	4209215.90
		0.00018			600603.72	4209219.54

Source Pathway - Source Inputs

Line Volume Sources

Source Type: LINE VOLUME

Source: SLINE1

Length of Side [m]	Emission Rate [g/ s]	Building Height [m]	X Coordinate for Points [m]	Y Coordinate for points [m]	Base Elevation [m]	Release Height [m]
3.05	1.00000		600654.41	4209215.29	1.98	0.00
			600597.41	4209003.57	3.00	0.00
			600551.26	4209009.68	3.14	0.00
			600487.48	4208979.82	3.33	0.00
			600439.30	4208995.43	3.13	0.00
			600250.65	4208417.95	7.44	0.00
			600192.29	4208240.84	9.11	0.00
			600163.79	4208196.05	9.94	0.00
			600068.79	4208099.69	10.02	0.00
			599879.76	4207921.82	12.51	0.00
			599777.20	4207862.45	12.68	0.00
			599550.49	4207779.68	14.10	0.00

Source Pathway - Source Inputs

Volume Sources Generated from Line Sources

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000001	600654.01	4209213.82	1.95	0.00	0.00307	3.05		2.84	1.93
	L0000002	600652.43	4209207.93	2.02	0.00	0.00307	3.05		2.84	1.93
	L0000003	600650.84	4209202.04	2.08	0.00	0.00307	3.05		2.84	1.93
	L0000004	600649.26	4209196.16	2.14	0.00	0.00307	3.05		2.84	1.93
	L0000005	600647.67	4209190.27	2.21	0.00	0.00307	3.05		2.84	1.93
	L0000006	600646.09	4209184.39	2.27	0.00	0.00307	3.05		2.84	1.93
	L0000007	600644.50	4209178.50	2.33	0.00	0.00307	3.05		2.84	1.93
	L0000008	600642.92	4209172.61	2.40	0.00	0.00307	3.05		2.84	1.93
	L0000009	600641.33	4209166.73	2.46	0.00	0.00307	3.05		2.84	1.93
	L0000010	600639.75	4209160.84	2.52	0.00	0.00307	3.05		2.84	1.93
	L0000011	600638.17	4209154.95	2.59	0.00	0.00307	3.05		2.84	1.93
	L0000012	600636.58	4209149.07	2.65	0.00	0.00307	3.05		2.84	1.93
	L0000013	600635.00	4209143.18	2.71	0.00	0.00307	3.05		2.84	1.93
	L0000014	600633.41	4209137.29	2.78	0.00	0.00307	3.05		2.84	1.93
	L0000015	600631.83	4209131.41	2.84	0.00	0.00307	3.05		2.84	1.93
	L0000016	600630.24	4209125.52	2.90	0.00	0.00307	3.05		2.84	1.93
	L0000017	600628.66	4209119.64	2.97	0.00	0.00307	3.05		2.84	1.93
	L0000018	600627.07	4209113.75	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000019	600625.49	4209107.86	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000020	600623.90	4209101.98	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000021	600622.32	4209096.09	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000022	600620.73	4209090.20	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000023	600619.15	4209084.32	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000024	600617.56	4209078.43	3.00	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000025	600615.98	4209072.54	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000026	600614.39	4209066.66	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000027	600612.81	4209060.77	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000028	600611.22	4209054.88	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000029	600609.64	4209049.00	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000030	600608.05	4209043.11	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000031	600606.47	4209037.23	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000032	600604.88	4209031.34	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000033	600603.30	4209025.45	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000034	600601.71	4209019.57	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000035	600600.13	4209013.68	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000036	600598.55	4209007.79	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000037	600595.70	4209003.80	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000038	600589.66	4209004.60	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000039	600583.62	4209005.39	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000040	600577.57	4209006.19	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000041	600571.53	4209006.99	3.00	0.00	0.00307	3.05		2.84	1.93
	L0000042	600565.49	4209007.79	3.01	0.00	0.00307	3.05		2.84	1.93
	L0000043	600559.44	4209008.59	3.03	0.00	0.00307	3.05		2.84	1.93
	L0000044	600553.40	4209009.39	3.04	0.00	0.00307	3.05		2.84	1.93
	L0000045	600547.69	4209008.01	3.05	0.00	0.00307	3.05		2.84	1.93
	L0000046	600542.17	4209005.42	3.08	0.00	0.00307	3.05		2.84	1.93
	L0000047	600536.65	4209002.84	3.10	0.00	0.00307	3.05		2.84	1.93
	L0000048	600531.13	4209000.25	3.13	0.00	0.00307	3.05		2.84	1.93
	L0000049	600525.61	4208997.67	3.17	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000050	600520.09	4208995.08	3.21	0.00	0.00307	3.05		2.84	1.93
	L0000051	600514.57	4208992.50	3.25	0.00	0.00307	3.05		2.84	1.93
	L0000052	600509.05	4208989.91	3.30	0.00	0.00307	3.05		2.84	1.93
	L0000053	600503.52	4208987.33	3.35	0.00	0.00307	3.05		2.84	1.93
	L0000054	600498.00	4208984.75	3.41	0.00	0.00307	3.05		2.84	1.93
	L0000055	600492.48	4208982.16	3.44	0.00	0.00307	3.05		2.84	1.93
	L0000056	600486.94	4208979.99	3.46	0.00	0.00307	3.05		2.84	1.93
	L0000057	600481.14	4208981.87	3.44	0.00	0.00307	3.05		2.84	1.93
	L0000058	600475.34	4208983.75	3.42	0.00	0.00307	3.05		2.84	1.93
	L0000059	600469.54	4208985.63	3.40	0.00	0.00307	3.05		2.84	1.93
	L0000060	600463.74	4208987.51	3.37	0.00	0.00307	3.05		2.84	1.93
	L0000061	600457.94	4208989.39	3.35	0.00	0.00307	3.05		2.84	1.93
	L0000062	600452.14	4208991.27	3.33	0.00	0.00307	3.05		2.84	1.93
	L0000063	600446.34	4208993.14	3.31	0.00	0.00307	3.05		2.84	1.93
	L0000064	600440.54	4208995.02	3.29	0.00	0.00307	3.05		2.84	1.93
	L0000065	600437.81	4208990.87	3.33	0.00	0.00307	3.05		2.84	1.93
	L0000066	600435.92	4208985.08	3.40	0.00	0.00307	3.05		2.84	1.93
	L0000067	600434.02	4208979.29	3.46	0.00	0.00307	3.05		2.84	1.93
	L0000068	600432.13	4208973.49	3.52	0.00	0.00307	3.05		2.84	1.93
	L0000069	600430.24	4208967.70	3.58	0.00	0.00307	3.05		2.84	1.93
	L0000070	600428.35	4208961.90	3.65	0.00	0.00307	3.05		2.84	1.93
	L0000071	600426.45	4208956.11	3.71	0.00	0.00307	3.05		2.84	1.93
	L0000072	600424.56	4208950.31	3.77	0.00	0.00307	3.05		2.84	1.93
	L0000073	600422.67	4208944.52	3.83	0.00	0.00307	3.05		2.84	1.93
	L0000074	600420.77	4208938.72	3.90	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000075	600418.88	4208932.93	3.96	0.00	0.00307	3.05		2.84	1.93
	L0000076	600416.99	4208927.13	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000077	600415.09	4208921.34	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000078	600413.20	4208915.54	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000079	600411.31	4208909.75	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000080	600409.42	4208903.95	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000081	600407.52	4208898.16	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000082	600405.63	4208892.37	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000083	600403.74	4208886.57	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000084	600401.84	4208880.78	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000085	600399.95	4208874.98	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000086	600398.06	4208869.19	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000087	600396.16	4208863.39	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000088	600394.27	4208857.60	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000089	600392.38	4208851.80	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000090	600390.49	4208846.01	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000091	600388.59	4208840.21	4.00	0.00	0.00307	3.05		2.84	1.93
	L0000092	600386.70	4208834.42	4.02	0.00	0.00307	3.05		2.84	1.93
	L0000093	600384.81	4208828.62	4.08	0.00	0.00307	3.05		2.84	1.93
	L0000094	600382.91	4208822.83	4.14	0.00	0.00307	3.05		2.84	1.93
	L0000095	600381.02	4208817.04	4.21	0.00	0.00307	3.05		2.84	1.93
	L0000096	600379.13	4208811.24	4.27	0.00	0.00307	3.05		2.84	1.93
	L0000097	600377.24	4208805.45	4.33	0.00	0.00307	3.05		2.84	1.93
	L0000098	600375.34	4208799.65	4.39	0.00	0.00307	3.05		2.84	1.93
	L0000099	600373.45	4208793.86	4.46	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

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Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000100	600371.56	4208788.06	4.52	0.00	0.00307	3.05		2.84	1.93
	L0000101	600369.66	4208782.27	4.58	0.00	0.00307	3.05		2.84	1.93
	L0000102	600367.77	4208776.47	4.64	0.00	0.00307	3.05		2.84	1.93
	L0000103	600365.88	4208770.68	4.71	0.00	0.00307	3.05		2.84	1.93
	L0000104	600363.98	4208764.88	4.77	0.00	0.00307	3.05		2.84	1.93
	L0000105	600362.09	4208759.09	4.83	0.00	0.00307	3.05		2.84	1.93
	L0000106	600360.20	4208753.29	4.89	0.00	0.00307	3.05		2.84	1.93
	L0000107	600358.31	4208747.50	4.96	0.00	0.00307	3.05		2.84	1.93
	L0000108	600356.41	4208741.70	5.02	0.00	0.00307	3.05		2.84	1.93
	L0000109	600354.52	4208735.91	5.08	0.00	0.00307	3.05		2.84	1.93
	L0000110	600352.63	4208730.12	5.14	0.00	0.00307	3.05		2.84	1.93
	L0000111	600350.73	4208724.32	5.20	0.00	0.00307	3.05		2.84	1.93
	L0000112	600348.84	4208718.53	5.27	0.00	0.00307	3.05		2.84	1.93
	L0000113	600346.95	4208712.73	5.33	0.00	0.00307	3.05		2.84	1.93
	L0000114	600345.05	4208706.94	5.39	0.00	0.00307	3.05		2.84	1.93
	L0000115	600343.16	4208701.14	5.45	0.00	0.00307	3.05		2.84	1.93
	L0000116	600341.27	4208695.35	5.52	0.00	0.00307	3.05		2.84	1.93
	L0000117	600339.38	4208689.55	5.58	0.00	0.00307	3.05		2.84	1.93
	L0000118	600337.48	4208683.76	5.64	0.00	0.00307	3.05		2.84	1.93
	L0000119	600335.59	4208677.96	5.70	0.00	0.00307	3.05		2.84	1.93
	L0000120	600333.70	4208672.17	5.77	0.00	0.00307	3.05		2.84	1.93
	L0000121	600331.80	4208666.37	5.83	0.00	0.00307	3.05		2.84	1.93
	L0000122	600329.91	4208660.58	5.89	0.00	0.00307	3.05		2.84	1.93
	L0000123	600328.02	4208654.79	5.95	0.00	0.00307	3.05		2.84	1.93
	L0000124	600326.13	4208648.99	6.00	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

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SLINE1	L0000125	600324.23	4208643.20	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000126	600322.34	4208637.40	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000127	600320.45	4208631.61	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000128	600318.55	4208625.81	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000129	600316.66	4208620.02	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000130	600314.77	4208614.22	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000131	600312.87	4208608.43	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000132	600310.98	4208602.63	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000133	600309.09	4208596.84	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000134	600307.20	4208591.04	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000135	600305.30	4208585.25	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000136	600303.41	4208579.45	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000137	600301.52	4208573.66	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000138	600299.62	4208567.87	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000139	600297.73	4208562.07	6.00	0.00	0.00307	3.05		2.84	1.93
	L0000140	600295.84	4208556.28	6.01	0.00	0.00307	3.05		2.84	1.93
	L0000141	600293.94	4208550.48	6.08	0.00	0.00307	3.05		2.84	1.93
	L0000142	600292.05	4208544.69	6.14	0.00	0.00307	3.05		2.84	1.93
	L0000143	600290.16	4208538.89	6.20	0.00	0.00307	3.05		2.84	1.93
	L0000144	600288.27	4208533.10	6.26	0.00	0.00307	3.05		2.84	1.93
	L0000145	600286.37	4208527.30	6.33	0.00	0.00307	3.05		2.84	1.93
	L0000146	600284.48	4208521.51	6.39	0.00	0.00307	3.05		2.84	1.93
	L0000147	600282.59	4208515.71	6.47	0.00	0.00307	3.05		2.84	1.93
	L0000148	600280.69	4208509.92	6.54	0.00	0.00307	3.05		2.84	1.93
	L0000149	600278.80	4208504.12	6.61	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

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SLINE1	L0000150	600276.91	4208498.33	6.68	0.00	0.00307	3.05		2.84	1.93
	L0000151	600275.02	4208492.54	6.74	0.00	0.00307	3.05		2.84	1.93
	L0000152	600273.12	4208486.74	6.80	0.00	0.00307	3.05		2.84	1.93
	L0000153	600271.23	4208480.95	6.86	0.00	0.00307	3.05		2.84	1.93
	L0000154	600269.34	4208475.15	6.91	0.00	0.00307	3.05		2.84	1.93
	L0000155	600267.44	4208469.36	6.96	0.00	0.00307	3.05		2.84	1.93
	L0000156	600265.55	4208463.56	7.01	0.00	0.00307	3.05		2.84	1.93
	L0000157	600263.66	4208457.77	7.08	0.00	0.00307	3.05		2.84	1.93
	L0000158	600261.76	4208451.97	7.14	0.00	0.00307	3.05		2.84	1.93
	L0000159	600259.87	4208446.18	7.20	0.00	0.00307	3.05		2.84	1.93
	L0000160	600257.98	4208440.38	7.26	0.00	0.00307	3.05		2.84	1.93
	L0000161	600256.09	4208434.59	7.33	0.00	0.00307	3.05		2.84	1.93
	L0000162	600254.19	4208428.79	7.39	0.00	0.00307	3.05		2.84	1.93
	L0000163	600252.30	4208423.00	7.45	0.00	0.00307	3.05		2.84	1.93
	L0000164	600250.40	4208417.21	7.51	0.00	0.00307	3.05		2.84	1.93
	L0000165	600248.50	4208411.42	7.57	0.00	0.00307	3.05		2.84	1.93
	L0000166	600246.59	4208405.63	7.64	0.00	0.00307	3.05		2.84	1.93
	L0000167	600244.68	4208399.84	7.70	0.00	0.00307	3.05		2.84	1.93
	L0000168	600242.77	4208394.05	7.76	0.00	0.00307	3.05		2.84	1.93
	L0000169	600240.87	4208388.26	7.82	0.00	0.00307	3.05		2.84	1.93
	L0000170	600238.96	4208382.47	7.89	0.00	0.00307	3.05		2.84	1.93
	L0000171	600237.05	4208376.68	7.95	0.00	0.00307	3.05		2.84	1.93
	L0000172	600235.14	4208370.89	8.01	0.00	0.00307	3.05		2.84	1.93
	L0000173	600233.23	4208365.10	8.05	0.00	0.00307	3.05		2.84	1.93
	L0000174	600231.33	4208359.31	8.10	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000175	600229.42	4208353.52	8.15	0.00	0.00307	3.05		2.84	1.93
	L0000176	600227.51	4208347.73	8.21	0.00	0.00307	3.05		2.84	1.93
	L0000177	600225.60	4208341.94	8.27	0.00	0.00307	3.05		2.84	1.93
	L0000178	600223.70	4208336.15	8.33	0.00	0.00307	3.05		2.84	1.93
	L0000179	600221.79	4208330.36	8.40	0.00	0.00307	3.05		2.84	1.93
	L0000180	600219.88	4208324.57	8.47	0.00	0.00307	3.05		2.84	1.93
	L0000181	600217.97	4208318.78	8.54	0.00	0.00307	3.05		2.84	1.93
	L0000182	600216.07	4208312.99	8.62	0.00	0.00307	3.05		2.84	1.93
	L0000183	600214.16	4208307.20	8.69	0.00	0.00307	3.05		2.84	1.93
	L0000184	600212.25	4208301.41	8.76	0.00	0.00307	3.05		2.84	1.93
	L0000185	600210.34	4208295.62	8.82	0.00	0.00307	3.05		2.84	1.93
	L0000186	600208.43	4208289.83	8.88	0.00	0.00307	3.05		2.84	1.93
	L0000187	600206.53	4208284.04	8.95	0.00	0.00307	3.05		2.84	1.93
	L0000188	600204.62	4208278.25	9.00	0.00	0.00307	3.05		2.84	1.93
	L0000189	600202.71	4208272.46	9.01	0.00	0.00307	3.05		2.84	1.93
	L0000190	600200.80	4208266.67	9.02	0.00	0.00307	3.05		2.84	1.93
	L0000191	600198.90	4208260.88	9.04	0.00	0.00307	3.05		2.84	1.93
	L0000192	600196.99	4208255.09	9.06	0.00	0.00307	3.05		2.84	1.93
	L0000193	600195.08	4208249.30	9.09	0.00	0.00307	3.05		2.84	1.93
	L0000194	600193.17	4208243.51	9.11	0.00	0.00307	3.05		2.84	1.93
	L0000195	600190.53	4208238.07	9.15	0.00	0.00307	3.05		2.84	1.93
	L0000196	600187.26	4208232.93	9.19	0.00	0.00307	3.05		2.84	1.93
	L0000197	600183.98	4208227.78	9.23	0.00	0.00307	3.05		2.84	1.93
	L0000198	600180.71	4208222.64	9.28	0.00	0.00307	3.05		2.84	1.93
	L0000199	600177.44	4208217.50	9.34	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000200	600174.17	4208212.35	9.40	0.00	0.00307	3.05		2.84	1.93
	L0000201	600170.89	4208207.21	9.47	0.00	0.00307	3.05		2.84	1.93
	L0000202	600167.62	4208202.07	9.54	0.00	0.00307	3.05		2.84	1.93
	L0000203	600164.35	4208196.93	9.61	0.00	0.00307	3.05		2.84	1.93
	L0000204	600160.24	4208192.45	9.70	0.00	0.00307	3.05		2.84	1.93
	L0000205	600155.96	4208188.11	9.79	0.00	0.00307	3.05		2.84	1.93
	L0000206	600151.68	4208183.77	9.87	0.00	0.00307	3.05		2.84	1.93
	L0000207	600147.40	4208179.43	9.93	0.00	0.00307	3.05		2.84	1.93
	L0000208	600143.12	4208175.08	9.99	0.00	0.00307	3.05		2.84	1.93
	L0000209	600138.84	4208170.74	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000210	600134.56	4208166.40	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000211	600130.28	4208162.06	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000212	600126.00	4208157.72	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000213	600121.72	4208153.38	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000214	600117.44	4208149.04	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000215	600113.16	4208144.70	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000216	600108.88	4208140.36	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000217	600104.60	4208136.02	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000218	600100.32	4208131.67	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000219	600096.04	4208127.33	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000220	600091.76	4208122.99	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000221	600087.48	4208118.65	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000222	600083.20	4208114.31	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000223	600078.92	4208109.97	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000224	600074.64	4208105.63	10.00	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000225	600070.36	4208101.29	10.00	0.00	0.00307	3.05		2.84	1.93
	L0000226	600065.98	4208097.05	10.05	0.00	0.00307	3.05		2.84	1.93
	L0000227	600061.54	4208092.87	10.12	0.00	0.00307	3.05		2.84	1.93
	L0000228	600057.10	4208088.70	10.22	0.00	0.00307	3.05		2.84	1.93
	L0000229	600052.66	4208084.52	10.32	0.00	0.00307	3.05		2.84	1.93
	L0000230	600048.22	4208080.34	10.43	0.00	0.00307	3.05		2.84	1.93
	L0000231	600043.78	4208076.16	10.54	0.00	0.00307	3.05		2.84	1.93
	L0000232	600039.34	4208071.99	10.64	0.00	0.00307	3.05		2.84	1.93
	L0000233	600034.90	4208067.81	10.75	0.00	0.00307	3.05		2.84	1.93
	L0000234	600030.47	4208063.63	10.85	0.00	0.00307	3.05		2.84	1.93
	L0000235	600026.03	4208059.45	10.96	0.00	0.00307	3.05		2.84	1.93
	L0000236	600021.59	4208055.28	11.07	0.00	0.00307	3.05		2.84	1.93
	L0000237	600017.15	4208051.10	11.17	0.00	0.00307	3.05		2.84	1.93
	L0000238	600012.71	4208046.92	11.28	0.00	0.00307	3.05		2.84	1.93
	L0000239	600008.27	4208042.74	11.38	0.00	0.00307	3.05		2.84	1.93
	L0000240	600003.83	4208038.57	11.49	0.00	0.00307	3.05		2.84	1.93
	L0000241	599999.39	4208034.39	11.60	0.00	0.00307	3.05		2.84	1.93
	L0000242	599994.95	4208030.21	11.66	0.00	0.00307	3.05		2.84	1.93
	L0000243	599990.51	4208026.03	11.71	0.00	0.00307	3.05		2.84	1.93
	L0000244	599986.07	4208021.86	11.75	0.00	0.00307	3.05		2.84	1.93
	L0000245	599981.63	4208017.68	11.80	0.00	0.00307	3.05		2.84	1.93
	L0000246	599977.19	4208013.50	11.84	0.00	0.00307	3.05		2.84	1.93
	L0000247	599972.75	4208009.32	11.89	0.00	0.00307	3.05		2.84	1.93
	L0000248	599968.31	4208005.15	11.93	0.00	0.00307	3.05		2.84	1.93
	L0000249	599963.87	4208000.97	11.98	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000250	599959.43	4207996.79	12.01	0.00	0.00307	3.05		2.84	1.93
	L0000251	599954.99	4207992.61	12.04	0.00	0.00307	3.05		2.84	1.93
	L0000252	599950.55	4207988.44	12.07	0.00	0.00307	3.05		2.84	1.93
	L0000253	599946.11	4207984.26	12.11	0.00	0.00307	3.05		2.84	1.93
	L0000254	599941.67	4207980.08	12.15	0.00	0.00307	3.05		2.84	1.93
	L0000255	599937.23	4207975.91	12.20	0.00	0.00307	3.05		2.84	1.93
	L0000256	599932.79	4207971.73	12.26	0.00	0.00307	3.05		2.84	1.93
	L0000257	599928.35	4207967.55	12.32	0.00	0.00307	3.05		2.84	1.93
	L0000258	599923.91	4207963.37	12.36	0.00	0.00307	3.05		2.84	1.93
	L0000259	599919.47	4207959.20	12.34	0.00	0.00307	3.05		2.84	1.93
	L0000260	599915.03	4207955.02	12.32	0.00	0.00307	3.05		2.84	1.93
	L0000261	599910.59	4207950.84	12.31	0.00	0.00307	3.05		2.84	1.93
	L0000262	599906.15	4207946.66	12.29	0.00	0.00307	3.05		2.84	1.93
	L0000263	599901.72	4207942.49	12.27	0.00	0.00307	3.05		2.84	1.93
	L0000264	599897.28	4207938.31	12.26	0.00	0.00307	3.05		2.84	1.93
	L0000265	599892.84	4207934.13	12.24	0.00	0.00307	3.05		2.84	1.93
	L0000266	599888.40	4207929.95	12.22	0.00	0.00307	3.05		2.84	1.93
	L0000267	599883.96	4207925.78	12.20	0.00	0.00307	3.05		2.84	1.93
	L0000268	599879.47	4207921.66	12.19	0.00	0.00307	3.05		2.84	1.93
	L0000269	599874.20	4207918.60	12.15	0.00	0.00307	3.05		2.84	1.93
	L0000270	599868.92	4207915.55	12.11	0.00	0.00307	3.05		2.84	1.93
	L0000271	599863.65	4207912.50	12.07	0.00	0.00307	3.05		2.84	1.93
	L0000272	599858.37	4207909.44	12.03	0.00	0.00307	3.05		2.84	1.93
	L0000273	599853.09	4207906.39	11.99	0.00	0.00307	3.05		2.84	1.93
	L0000274	599847.82	4207903.33	12.03	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000275	599842.54	4207900.28	12.10	0.00	0.00307	3.05		2.84	1.93
	L0000276	599837.27	4207897.22	12.16	0.00	0.00307	3.05		2.84	1.93
	L0000277	599831.99	4207894.17	12.23	0.00	0.00307	3.05		2.84	1.93
	L0000278	599826.72	4207891.12	12.29	0.00	0.00307	3.05		2.84	1.93
	L0000279	599821.44	4207888.06	12.35	0.00	0.00307	3.05		2.84	1.93
	L0000280	599816.16	4207885.01	12.42	0.00	0.00307	3.05		2.84	1.93
	L0000281	599810.89	4207881.95	12.48	0.00	0.00307	3.05		2.84	1.93
	L0000282	599805.61	4207878.90	12.55	0.00	0.00307	3.05		2.84	1.93
	L0000283	599800.34	4207875.84	12.61	0.00	0.00307	3.05		2.84	1.93
	L0000284	599795.06	4207872.79	12.68	0.00	0.00307	3.05		2.84	1.93
	L0000285	599789.79	4207869.74	12.74	0.00	0.00307	3.05		2.84	1.93
	L0000286	599784.51	4207866.68	12.81	0.00	0.00307	3.05		2.84	1.93
	L0000287	599779.23	4207863.63	12.87	0.00	0.00307	3.05		2.84	1.93
	L0000288	599773.68	4207861.16	12.92	0.00	0.00307	3.05		2.84	1.93
	L0000289	599767.96	4207859.07	12.97	0.00	0.00307	3.05		2.84	1.93
	L0000290	599762.23	4207856.98	13.01	0.00	0.00307	3.05		2.84	1.93
	L0000291	599756.50	4207854.89	13.05	0.00	0.00307	3.05		2.84	1.93
	L0000292	599750.78	4207852.80	13.10	0.00	0.00307	3.05		2.84	1.93
	L0000293	599745.05	4207850.71	13.14	0.00	0.00307	3.05		2.84	1.93
	L0000294	599739.32	4207848.62	13.19	0.00	0.00307	3.05		2.84	1.93
	L0000295	599733.60	4207846.53	13.23	0.00	0.00307	3.05		2.84	1.93
	L0000296	599727.87	4207844.44	13.27	0.00	0.00307	3.05		2.84	1.93
	L0000297	599722.15	4207842.35	13.32	0.00	0.00307	3.05		2.84	1.93
	L0000298	599716.42	4207840.26	13.36	0.00	0.00307	3.05		2.84	1.93
	L0000299	599710.69	4207838.17	13.40	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000300	599704.97	4207836.08	13.46	0.00	0.00307	3.05		2.84	1.93
	L0000301	599699.24	4207833.99	13.52	0.00	0.00307	3.05		2.84	1.93
	L0000302	599693.51	4207831.90	13.58	0.00	0.00307	3.05		2.84	1.93
	L0000303	599687.79	4207829.81	13.64	0.00	0.00307	3.05		2.84	1.93
	L0000304	599682.06	4207827.72	13.69	0.00	0.00307	3.05		2.84	1.93
	L0000305	599676.34	4207825.62	13.74	0.00	0.00307	3.05		2.84	1.93
	L0000306	599670.61	4207823.53	13.78	0.00	0.00307	3.05		2.84	1.93
	L0000307	599664.88	4207821.44	13.83	0.00	0.00307	3.05		2.84	1.93
	L0000308	599659.16	4207819.35	13.86	0.00	0.00307	3.05		2.84	1.93
	L0000309	599653.43	4207817.26	13.90	0.00	0.00307	3.05		2.84	1.93
	L0000310	599647.70	4207815.17	13.93	0.00	0.00307	3.05		2.84	1.93
	L0000311	599641.98	4207813.08	13.96	0.00	0.00307	3.05		2.84	1.93
	L0000312	599636.25	4207810.99	13.99	0.00	0.00307	3.05		2.84	1.93
	L0000313	599630.52	4207808.90	14.01	0.00	0.00307	3.05		2.84	1.93
	L0000314	599624.80	4207806.81	14.03	0.00	0.00307	3.05		2.84	1.93
	L0000315	599619.07	4207804.72	14.05	0.00	0.00307	3.05		2.84	1.93
	L0000316	599613.35	4207802.63	14.07	0.00	0.00307	3.05		2.84	1.93
	L0000317	599607.62	4207800.54	14.10	0.00	0.00307	3.05		2.84	1.93
	L0000318	599601.89	4207798.45	14.12	0.00	0.00307	3.05		2.84	1.93
	L0000319	599596.17	4207796.36	14.14	0.00	0.00307	3.05		2.84	1.93
	L0000320	599590.44	4207794.27	14.16	0.00	0.00307	3.05		2.84	1.93
	L0000321	599584.71	4207792.18	14.18	0.00	0.00307	3.05		2.84	1.93
	L0000322	599578.99	4207790.09	14.20	0.00	0.00307	3.05		2.84	1.93
	L0000323	599573.26	4207787.99	14.23	0.00	0.00307	3.05		2.84	1.93
	L0000324	599567.54	4207785.90	14.25	0.00	0.00307	3.05		2.84	1.93

Source Pathway - Source Inputs

AERMOD

Line Source ID	Volume Source ID	X Coordinate [m]	Y Coordinate [m]	Base Elevation [m]	Release Height [m[	Emission Rate [g/s]	Length of Side [m]	Building Height [m]	Initial Lateral Dimencion [m]	Initial Vertical Dimencion [m]
SLINE1	L0000325	599561.81	4207783.81	14.27	0.00	0.00307	3.05		2.84	1.93
	L0000326	599556.08	4207781.72	14.24	0.00	0.00307	3.05		2.84	1.93

Meteorology Pathway

Met Input Data

Surface Met Data

Filename: ..\..\Met Data\Dow - New\AERMOD.SFC
Format Type: Default AERMET format

Profile Met Data

Filename: ..\..\Met Data\Dow - New\AERMOD.PFL
Format Type: Default AERMET format

Wind Speed

☐ Wind Speeds are Vector Mean (Not Scalar Means)

Wind Direction

Rotation Adjustment [deg]:

Potential Temperature Profile

Base Elevation above MSL (for Primary Met Tower): 3.00 [m]

Meteorological Station Data

Stations	Station No.	Year	X Coordinate [m]	Y Coordinate [m]	Station Name
Surface		2013			OAKLAND/WSO AP
Upper Air		2013			
On-Site		2013			

Data Period

Data Period to Process

Start Date: 1/1/2013 Start Hour: 1 End Date: 12/31/2017 End Hour: 24

Wind Speed Categories

Stability Category	Wind Speed [m/s]	Stability Category	Wind Speed [m/s]
A	1.54	D	8.23
B	3.09	E	10.8
C	5.14	F	No Upper Bound

Output Pathway

Tabular Printed Outputs

Short Term Averaging Period	RECTABLE Highest Values Table										MAXTABLE Maximum Values Table	DAYTABLE Daily Values Table
	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th		
1	■	☐	☐	☐	☐	☐	☐	☐	☐	☐		No

Contour Plot Files (PLOTFILE)

Path for PLOTFILES: \AERMOD.AD

Averaging Period	Source Group ID	High Value	File Name
1	COOL	1st	01H1G001.PLT
1	DPM	1st	01H1G002.PLT
1	PM2.5	1st	01H1G003.PLT
1	SCRUBBER	1st	01H1G004.PLT
1	SLINE1	1st	01H1G005.PLT
Period	COOL	N/A	PE00G001.PLT
Period	DPM	N/A	PE00G002.PLT
Period	PM2.5	N/A	PE00G003.PLT
Period	SCRUBBER	N/A	PE00G004.PLT
Period	SLINE1	N/A	PE00G005.PLT

Results Summary

C:\Users\MikeRatte\Documents\Projects\Pittsburg Iron Salts Plant\Air

DPM - Concentration - Source Group: COOL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	354.06970	ug/m^3	600500.00	4209175.00	2.35	1.80	2.35	10/3/2014, 18
PERIOD		9.15402	ug/m^3	600696.11	4209219.83	1.89	1.80	1.89	

DPM - Concentration - Source Group: DPM

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	17575.66501	ug/m^3	600700.00	4209375.00	1.00	1.80	1.00	12/27/2017, 9
PERIOD		26.47985	ug/m^3	600696.11	4209219.83	1.89	1.80	1.89	

DPM - Concentration - Source Group: PM2.5

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	19385.23058	ug/m^3	600750.00	4209475.00	0.14	1.80	0.14	12/27/2017, 9
PERIOD		26.69053	ug/m^3	600696.11	4209219.83	1.89	1.80	1.89	

DPM - Concentration - Source Group: SCRUBBER

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	655.13834	ug/m^3	600500.00	4209225.00	2.00	1.80	2.00	9/2/2017, 19
PERIOD		28.68274	ug/m^3	600696.11	4209219.83	1.89	1.80	1.89	

Results Summary

C:\Users\MikeRatte\Documents\Projects\Pittsburg Iron Salts Plant\Air

DPM - Concentration - Source Group: SLINE1

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	1994.25410	ug/m^3	600450.00	4209025.00	3.00	1.80	3.00	12/28/2016, 9
PERIOD		14.27348	ug/m^3	600500.00	4208975.00	3.50	1.80	3.50	

Tower Specifications: Model T-2250

Cooling Tower Systems, Inc.

Design and Operating Conditions		Water Distribution System Construction Materials	
Tower Type:	Counter Flow Induced Draft	Stand Pipe:	PVC
Water Flow Rate (GPM):	737 GPM	Sprinkler Head:	AC
Entering Water Temperature	95°F	Sprinkler Pipes:	PVC
Leaving Water Temperature	85°F	**Mechanical Equipment**	
Wet Bulb Temperature:	75°F	Fan Unit:	One Unit per Tower
Total Fan BHP:	7.5 HP	Type:	Axial Flow
Total Pump Head:	12’	Manufacturer:	CTS
Drift Loss of Water Flow:	0.1%	Diameter:	93”
Evaporation Loss of Water Flow:	0.93%	Blade Material:	AC
Design Wind Load:	41 lbs/sq. ft.	Hub Material:	AC
Structural Details		Nominal Air Volume:	61,270 CFM
Overall Diameter:	148 3/8”	**Fan Motor**	
Overall Height:	125 5/8”	Number of motors:	One Unit per Tower
Dry Weight:	2,270 lbs.	Type:	Induction
Operating Weight:	8,723 lbs.	Manufacturer:	CTS
Basic Tower Construction Materials		Insulation:	F Class
Tower Support Frame Assembly	HDGS	Rated HP:	7.5 HP
Casing:	FRP	Voltage and phase:	220/440V/3
Casing Supporters	HDGS	**Piping Connections**	
Cold Water Basin	FRP	Primary Water Inlet Diameter	8”
Filling:	PVC	Primary Water Outlet Diameter:	8”
Filling Supports:	HDGS	Auto fill inlet diameter:	1.25”
Fan Guard	HDGS	Quick fill inlet diameter:	1.25”
Mechanical Equipment Supports:	HDGS	Overflow outlet diameter:	2”
Inlet Louvers:	PVC	Drain diameter:	2”
Bolts, Nuts & Washers:	STS	Water Flow (GPM):	737 GPM

Materials Key			
FRP	Fiberglass Reinforced Polyester	STS	Stainless Steel
HDGS	Hot Dipped Galvanized Steel	AC	Aluminum Alloy Cast

Cooling Tower Systems, Inc.
196 Lower Cherry Street Macon, GA 31201
TF: 800.752.1905 F: 478.755.8304 www.coolingtowersystems.com info@coolingtowersystems.com

Cooling Tower Operational Data				
Source Description	**Average Recirculation Flow Rate (gal/min)**	**Peak Hourly Recirculation Flow Rate[1] (gal/min)**	**Annual Operation (hrs/yr)**	**Annual Throughput[2] (gal/yr)**
Cooling Tower	737	1105.5	6,240	275,932,800

Notes: (1) Peak Hourly is conservatively estimated at 1.5 average recirculation rate.

(2) Annual Throughput = Avg Hourly Flow Rate (gal/min) * Annual Operation

Cooling Tower Emission Factors			
Process	**VOC**	**PM**	**Chloroform**
Chemical Plant Cooling Towers	0.7	19	0.018

Sources: VOC - AP-42, Section 5.1, Table 5.1-2 PM - AP-42, Section 13.4, Table 13.4-1

PM - AP-42, Section 13.4, Table 13.4-1

Chloroform - Summary of Literature Search on HAP Emissions From IPCTs (2004, RTI)

Cooling Tower Emissions			
Process	**VOC**	**PM10**	**Chloroform**
Peak Hourly Emissions (lb/hr)	0.04643	1.26027	0.00119
Annual Emissions (lb/yr)	193.15	5242.72	4.97
Average Daily Emissions (lb/yr)	0.03095	20.16432	0.01910

HCl Gas Scrubbing using Water

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for RK Fabrication (Stage 1 of 2, acid fumes from ferric chloride tank)

Inlet Gas Flow	15,000	acfm	HCl in Blowdown	1.0%	
Inlet HCl Concentration	20	ppm_v	Blowdown pH	0.5	
Atmospheric Pressure	28.82	in. Hg	HTU_{OG}	0.86	ft
Inlet Static Pressure	-2	in.WC	NTU	9.30	
Inlet Gas Temperature	140	°F	HCl Gas Removal	97.0%	
Make-up Water Temperature	70	°F	Outlet HCl Gas Concn.	0.6	ppm_v
Make-up Water HCl Content	0%		Outlet Air Flow	15,077	acfm
Liquid Flow Rate	100	gpm	Packing Liquid Holdup	1.8%	
Blowdown Rate	0.26	gpm	Packing Volume	238	ft^3
Tower Diameter	5.5	ft	Liquid Residence Time	20	sec
Packing Height	10.0	ft	Pressure Gradient	0.16	in.WC/ft
Design Safety Factor	1.25		Packing Pressure Drop	1.6	in.WC
Mist Eliminator Type	No.2 NUPAC (1.5 ft)		Mist Eliminator ΔP	0.5	in.WC
Packing Type	Q-PAC				

Air Flow Rate	12,693	scfm	Cross-Section Area	23.8	ft^2
=	32.81	lbmol/min	Gas Molecular Weight	29	lb/lbmol
HCl Removed	0.001	lbmol/min	Gas Density	0.064	lb/ft^3
=	0.02	lb/min	Liquid Density	8.39	lb/gal
=	1.4	lb/h	Superficial Gas Velocity	631	ft/min
=	0.3	mol/min	Gas Loading	2,408	$lb/h\text{-}ft^2$
blowdown	16	gal/h	Liquid Loading	2,119	$lb/h\text{-}ft^2$
	1.0	L/min	=	4.2	gpm/ft^2
x_1	0.0052	mol/mol	T_{in}	333	K
x_2	0.0052	mol/mol	T_{out}	333	K
y_1*	0.61	ppm_v	P_{in}	0.958	atm
y_2*	0.61	ppm_v	P_{out}	0.953	atm
Heat of Solution	1.22E+03	Btu/h	HTU_G	0.86	ft
Sensible Heat	8.75E+03	Btu/h	HTU_L	0.32	ft
Evaporation	-0.007	$lbmol_{H2O}/min$	$HTU_G + HTU_L/A$	0.86	ft
Inlet Air Moisture Content	20.5%	v/v	Air-Water Partition Coeff.	1.1E-04	atm-mol/mol
Dry Gas Flow	26.08	$lbmol_{DG}/min$	Absorption Factor	1.2E+04	
Outlet Moisture Content	0.258	mol_{H2O}/mol_{DG}	ρ_L	1.01	g/cm^3
=	20.51%	v/v	μ_L	1.08	lb/h-ft
Outlet Gas Flow	12,690	scfm	D_L	1.25E-04	ft^2/h
Outlet Liquid Temperature	140	°F			

Scrubbing Hydrogen Chloride Gas using Caustic Soda

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for RK Fabrication (Stage 2 of 2, tail gas from HCl absorber)

Inlet Gas Flow	15,112	acfm	Steady-State Temperature	140	°F
Inlet Wet-Bulb Temperature	140	°F	Outlet Gas Flow	15,110	acfm
Inlet HCl Concentration	0.6	ppm_v	TDS in Blowdown	0.1%	
Inlet CO_2 Concentration	415	ppm_v	HTU_{HCl}	0.86	ft
Liquid Recirculation Rate	100	gpm	NTU_{HCl}	9.28	
Blowdown Rate	0.1	gpm	Outlet HCl Concentration	0.00006	ppm_v
Make-up Water Temperature	70	°F	HCl Removal Efficiency	99.99%	
Atmospheric Pressure	28.82	in.Hg	Pressure Gradient	0.16	in.WC/ft
Inlet Static Pressure	-5	in.WC	Packing Pressure Drop	1.6	in.WC
pH in Sump	7.5		Liquid Holdup	1.8%	
Make-up NaOH Concentration	25%		Packing Volume	238	ft^3
Tower Diameter	5.5	ft	Liquid Residence Time	20	sec
Packing Height	10.0	ft	NaOH Usage	0.048	lb/h
Safety Factor	1.25		=	0.018	gal/h
Packing Type	Q-PAC		=	0.0003	gpm
Demister Type	No.2 NUPAC (1.5 ft)		Demister Pressure Drop	0.7	in.WC

Inlet Gas Flow	12,690	scfm	Cross-Section Area	23.8	ft^2
=	32.8	lbmol/min	Gas Molecular Weight	29	lb/lbmol
HCl Removed	0.00002	lbmol/min	Inlet Gas Density	0.063	lb/ft^3
=	0.0007	lb/min	Liquid Density	8.35	lb/gal
=	0.009	mol/min	Inlet Gas Velocity	636	ft/min
CO_2 Removed	7.27E-08	lbmol/min	Outlet Gas Velocity	636	ft/min
blowdown	6.0	gal/h	Gas Loading	2,402	$lb/h\text{-}ft^2$
=	0.379	L/min	Liquid Loading	2,109	$lb/h\text{-}ft^2$
$[Cl^-]$	0.024	mol/L	=	4.2	gpm/ft^2
$[CO_2]+[HCO_3^-]+[CO_3^=]$	8.71E-05	mol/L	$[H^+]$	3.16E-08	mol/L
$[CO_2]$	6.04E-06	mol/L	T	333	K
$[HCO_3^-]$	8.10E-05	mol/L	P_T	0.95	atm
$[CO_3^=]$	1.11E-07	mol/L	K_w	1.03E-13	mol^2/L^2
$[Na^+]$	2.39E-02	mol/L	CO_2 K_1	4.24E-07	mol/L
NaCl	1.4	g/L	CO_2 K_2	4.33E-11	mol/L
$NaHCO_3$	0.0	g/L		HCl	CO_2
Na_2CO_3	0.0	g/L	H (atm/mole fraction)	n/a	3,183
free NaOH	0.000	g/L	y_1 (ppm_v)	0.6	415.0
Total Dissolved Solids	1.4	g/L	y_2 (ppm_v)	0.0	415.0
Blowdown Density	1.00	g/mL	Removal Efficiency	99.99%	0.001%
$NaHCO_3$ Saturation Index	-5.6		y_1* (ppm_v)	0	364.1
Na_2CO_3 Saturation Index	-11.0		y_2* (ppm_v)	0	363.7
NaCl Saturation Index	-4.7		$(y\text{-}y^*)_{lm}$ (ppm_v)	0.07	51
Heat of Reaction	1.13E+00	Btu/min	NTU	9.28	0.68
Sensible Heat	5.84E+01	Btu/min	HTU (ft)	0.86	11.8
Evaporation	-0.003	lbmol/min	NCG Flow	26.0	lbmol/min
Satd. $y_{1,H2O}$	20.7%		Make-up NaOH Density	1.27	g/mL
=	0.261	mol_{H2O}/mol_{NCG}	Caustic reacting with HCl	99.6%	of total
$y_{2,H2O}$	20.7%		Alkali Exhaustion per Pass	22%	

Stack Gas Exhaust Flow Rate	scfm	12,690
Stack Gas Exhaust Flow Rate	m3/hour	21,560

	MW	ppb	ug/m3	g/hour	lb/hour	lb/year	MT/year
HCL (Uncontrolled)	36.46	20,000	29,824	643	1.42	12,418	
HCL (Stage 1)	36.46	600	895	19.3	0.04	373	
HCL (Stage 2)	36.46	0.06	0.09	1.93E-03	4.25E-06	0.037	
CO2	44.01	415,000	747,004	1.61E+04	3.55E+01	311,037	141

Pencco Iron Salts Manufacturing Facility Project (AP-23-0167)
Initial Study/ Mitigated Negative Declaration (SCH No. 2025010603)

Adams Broadwell Joseph & Cardozo
June 24, 2025 Comment Letter

Response to Comments
July 11, 2025

This Response to Comments document contains the comments by Adams Broadwell Joseph & Cardozo that were received the day of the scheduled Planning Commission meeting (June 24, 2025) for the Pencco Iron Salts Manufacturing Facility Project Draft Initial Study/Mitigated Negative Declaration (IS/MND). The June 24, 2025 Planning Commission Meeting was continued.

BACKGROUND

The City of Pittsburg Planning Division, as lead agency, released the Draft IS/MND for public review beginning on January 22, 2025, and ending on February 21, 2025, pursuant to CEQA Guidelines Section 15105. The Draft IS/MND and supporting documents were made available on the City's website and by appointment during normal business hours at the City of Pittsburg Planning Division, located at 65 Civic Avenue, Pittsburg, CA 94565. According to CEQA Guidelines Sections 15073 and 15074, the lead agency must consider the comments received during consultation and review periods together with the negative declaration. However, unlike with an Environmental Impact Report, comments received on a negative declaration are not required to be attached to the negative declaration, nor must the lead agency make specific written responses to public agencies. Nonetheless, the City chose to provide responses to letters that had specific comments regarding the analysis within the Draft IS/MND.

The Response to Comments Document (April 8, 2025) was provided as Attachment 2 of the Staff Report for the Item on the scheduled June 24, 2025 Planning Commission Agenda. The Response to Comments Document (April 8, 2025) provided detailed responses to the February 21, 2025 Adams Broadwell Joseph & Cardozo Comment Letter and also provided responses to comments received by the Confederated Villages of Lisjan Nation (January 30, 2025).

RESPONSE TO COMMENTS

This Response to Comments Document includes responses to Comment Letter 1 (Adams Broadwell Joseph & Cardozo, June 24, 2025). Letter 1 is bracketed with assigned comment numbers. The bracketed comment letter is followed by numbered responses corresponding to each bracketed comment.

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June 24, 2025

VIA E-Mail, U.S. Mail, and Hand Delivery

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Re: **City of Pittsburg Planning Commission Agenda Item No. 4: Pencco Iron Salts Manufacturing Facility Project (AP-23-0167)**

Dear Chair Foster, Planning Commissioners, Ms. Evenson, Mr. Brenyah-Addow, and Mr. Funderburg:

We write on behalf of Safe Fuel and Energy Resources California ("SAFER CA") regarding Agenda Item No. 4, which concerns the Iron Salts Manufacturing Facility Project ("Project") (AP-23-0167) proposed by Pencco, Inc. ("Applicant"), being considered by the City of Pittsburg ("City") Planning Commission at its June 24, 2025 meeting.

1-1

I. INTRODUCTION

SAFER CA respectfully objects to Staff's recommendation to approve the Project. As discussed herein, the record before the Planning Commission demonstrates that the City has not complied with the California Environmental Quality Act ("CEQA") and lacks substantial evidence to support the findings required to approve the Project's entitlements. SAFER CA urges the Planning

Commission to continue this hearing and require the City to comply with CEQA and applicable land use laws before considering Project approval.

SAFER CA submitted detailed comments on the Draft Initial Study ("IS") and Mitigated Negative Declaration[1] ("MND") during the public review period, raising substantial concerns regarding the adequacy of the City's environmental analysis.[2] SAFER CA's comments demonstrated that the Draft IS/MND failed to disclose, analyze, and mitigate potential adverse impacts from hazards, air quality, and public health arising from construction and operation of the Project.

As a threshold matter, the Staff Report erroneously claims the "fair argument" standard does not apply to the City's decision to prepare a mitigated negative declaration.[3] The City's assertion is contrary to longstanding legal principles governing environmental review and constitutes a prejudicial abuse of discretion in violation of CEQA.

1-1 cont.

In addition, the Staff Report and Responses to Comments ("RTCs") fail to adequately address or resolve many of the issues raised by SAFER CA in comments on the IS/MND, claiming there is no substantial evidence in the record requiring preparation of an environmental impact report ("EIR").[4] To the contrary, the record

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[1] City of Pittsburg, Pencco Iron Salts Manufacturing Facility: Draft Initial Study/Mitigated Negative Declaration (Jan. 2025) (hereinafter "Draft IS/MND"), *available at* https://www.pittsburgca.gov/home/showpublisheddocument/17101/638731534770730000.

[2] Letter to Maurice Brenyah-Addow, City of Pittsburg from Andrew J. Graf, Adams Broadwell Joseph & Cardozo re: Comments on Draft Initial Study/Mitigated Negative Declaration for the Pencco Iron Salts Manufacturing Facility Project (Case No. AP-23-0167, SCH No. 2025010603) (Feb. 21, 2025) (hereinafter "SAFER CA IS/MND Comments").

[3] City of Pittsburg, Planning Commission Staff Report re: Consideration of a Resolution Granting a Use Permit and Design Review and Adoption of an Initial Study Mitigated Negative Declaration and Mitigation Monitoring Reporting Program for the Pencco Iron Salts Manufacturing Facility, AP-23-0167 (UP, DR) (June 24, 2025) p. 7 (hereinafter "Staff Report"), *available at* https://onbaseweb.pittsburgca.gov/OnBaseAgendaOnline/Documents/DownloadFileBytes/Planning_Commission_1220_Agenda_Packet_6_24_2025_7_00_00_PM.pdf?documentType=5&meetingId=1220&isAttachment=True.

[4] *Id*. at pp. 6-7; attach. 2, City of Pittsburg, Pencco Iron Salts Manufacturing Facility Project (AP-23-0167) Initial Study/Mitigated Negative Declaration (SCH No. 202501603) Response to Comments (Apr. 8, 2025) (hereinafter "RTCs"), *available at* https://onbaseweb.pittsburgca.gov/OnBaseAgendaOnline/Documents/DownloadFileBytes/ATTACHMENT%202%20-

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contains substantial evidence, including comments from air quality and public health expert, James J. Clark, Ph.D.,[5] demonstrating that the Project may have significant air quality, public health, and hazard impacts that are not reduced to less than significant levels by the mitigation measures and conditions of approval proposed for the Project.

First, the City fails to evaluate the accidental release of acutely hazardous air pollutants by improperly relying on regulatory compliance without any site-specific analysis. Dr. Clark's comments demonstrate that Project operation may result in potentially significant air quality and public health impacts due to a reasonably foreseeable accidental release of chlorine gas which exceeds recommended thresholds set by the Bay Area Air Quality Management District ("BAAQMD"). Specifically, an accidental release of 1 ton of chlorine gas for 10 minutes could cause individuals within 1.3 miles of the Project site to experience or develop irreversible or other serious health effects or symptoms which could impair their ability to take protective action. Dr. Clark's expert analysis constitutes substantial evidence supporting a fair argument requiring the preparation of an EIR.

1-1 Cont.

Second, the City improperly defers analysis and mitigation of hazard materials impacts related to soil contamination. Its conclusion that the Project site is free of soil or groundwater contamination is unfounded, as it is based solely on the absence of prior testing rather than affirmative evidence demonstrating the site's environmental condition. Publicly available data from the surrounding areas indicates significant levels of contamination due to the larger complex's historical use and production of toxic chemicals. Without site-specific investigation and data, the City cannot reasonably determine that potential contamination impacts would be less than significant. Furthermore, the City cannot rely on a soil management plan ("SMP") as mitigation when the plan is legally unenforceable.

Third, the City fails to analyze the acute non-carcinogenic hazard risks associated with exposure to construction-related diesel particulate matter ("DPM")

%20COMMENT%20LETTER%20AND%20RESPONSES.PDF.pdf?documentType=1&meetingId=1220&itemId=16767&publishId=14546&isSection=False&isAttachment=True.

[5] **Attachment A**, Letter to Andrew J. Graf, Adams Broadwell Joseph & Cardozo from James J. Clark, Ph.D., Clark & Associates Environmental Consulting, Inc. re: Response to Comments on Draft Initial Study/Mitigated Negative Declaration for Pencco Iron Salts Manufacturing Facility, City of Pittsburg, California, SCH No. 2025010603 (June 24, 2025) (hereinafter "Clark Supplemental Comments").

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emissions. Although the record includes a health risk assessment, that analysis is deficient because it does not assess acute hazard impacts for any receptors, including on-site construction workers, who are particularly vulnerable to short-term exposure to DPM. Dr. Clark recommends application of acute reference exposure levels developed by public health agencies to determine whether the Project's construction-phase emissions could result in potentially significant health impacts. The City's failure to incorporate this methodology represents a critical omission in its environmental analysis.

1-1 Cont.

Finally, the City cannot make the findings required to approve the requested use permit or design review application. Given the potentially significant, unmitigated air quality, public health, and hazard impacts, the Planning Commission cannot find that the proposed project is not detrimental to the health, safety, and general welfare of the City.

SAFER CA urges the Planning Commission to continue this matter so that the City can prepare a comprehensive EIR which addresses the deficiencies identified below, as required by law.

II. THE FAIR ARGUMENT STANDARD APPLIES

The Staff Report claims the fair argument standard does not apply to the applications before it.[6] The City's assertion that this standard does not apply is legally incorrect and misstates CEQA's requirements. The fair argument standard governs the threshold decision of whether to prepare an EIR, and it applies whenever a lead agency is considering whether to proceed with a mitigated negative declaration for a project that is not exempt from CEQA.[7]

1-2

The fair argument test is CEQA's statutory requirement that an EIR be prepared for any project that "may have a significant effect on the environment."[8] Accordingly, if a proposed project is not categorically or statutorily exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR.[9] Conversely, an EIR may only be avoided if the lead agency determines –

[6] Staff Report at p. 7.
[7] Pub. Res. Code § 21151.
[8] *Id.* § 21151; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75; *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884.
[9] Pub. Res. Code §§ 21100(a), 21151; CEQA Guidelines § 15064(a)(1), (f)(1).

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based on the initial study and the entire administrative record – that there is no substantial evidence that the project may have a significant effect on the environment.[10] In that case, the agency may adopt a negative declaration.[11]

CEQA defines "significant effect upon the environment" as "a substantially or potentially adverse change in the environment."[12] A project may have such an effect if there is a reasonable probability that it will result in a significant impact.[13] Importantly, the presence of substantial evidence indicating that any aspect of the project could cause a significant impact triggers the requirement to prepare an EIR.[14]

The fair argument standard establishes a deliberately "low threshold" for EIR preparation.[15] If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR – even if other substantial evidence suggests impacts will not be significant.[16] Under this standard, the agency may not resolve conflicts in the evidence or determine which side presents a stronger argument; instead, any credible evidence of a potential significant impact compels the preparation or an

1-2
Cont.

[10] *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785.
[11] Pub. Res. Code § 21080(c)(1); CEQA Guidelines §§ 15063(b)(2), 15064(f)(3).
[12] Pub. Res. Code § 21068; CEQA Guidelines § 15382.
[13] *No Oil, Inc. v. City of Los Angeles*, 13 Cal.3d at 83, n. 16; *Sundstrom v. County of Mendicino* (1988) 202 Cal.App.3d 296, 309.
[14] CEQA Guidelines § 15063(b)(1).
[15] *Consolidated Irrig. Dist. v City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom v County of Mendocino* (1988) 202 Cal.App.3d 296, 310.
[16] *Save the Agoura Cornell Knoll v City of Agoura Hills* (2020) 46 Cal.App.5th 665, 689, 696; *Georgetown Preservation Soc'y v County of El Dorado* (2018) 30 Cal.App.5th 358, 373; *Jensen v City of Santa Rosa* (2018) 23 Cal.App.5th 877, 886; *Clews Land & Livestock v City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Soc'y, Inc. v County of Stanislaus* (1995) 33 Cal.App.4th 144, 150; *Brentwood Ass'n for No Drilling, Inc. v City of Los Angeles* (1982) 134 Cal.App.3d 491; *Friends of "B" St. v City of Hayward* (1980) 106 Cal.App.3d 988.

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EIR.[17] If there is a disagreement among experts about the significance of an effect on the environment, the lead agency must treat that effect as significant.[18]

1-2 Cont.

The City is legally incorrect that the fair argument standard does not apply. Unless the City demonstrates based on the entirety of the record that no substantial evidence supports a fair argument of potential significant impact, it is required by law to prepare an EIR. The failure to do so would constitute a prejudicial abuse of discretion and violation of CEQA.

III. AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED TO ADDRESS SIGNIFICANT AIR QUALITY, PUBLIC HEALTH, AND HAZARD IMPACTS

There is substantial evidence in the record supporting a fair argument that the proposed Project may result in significant, unmitigated air quality, public health, and hazard impacts. An EIR must be prepared before the Project can be approved.

A. Substantial Evidence Supports a Fair Argument of Significant Air Quality and Hazard Impacts Due to the Accidental Release of Chlorine Gas

1-3

SAFER CA commented that the IS/MND fails to adequately evaluate the potential impacts associated with the accidental release of hazardous substances, including hydrochloric acid, sulfuric acid, or chlorine.[19] While the City states that a risk management plan ("RMP") will be prepared for the proposed Project, including a process hazard analysis and an offsite consequences analysis ("OCA"), these analyses are deferred and excluded from CEQA review.[20] Instead, the City summarily concludes, without project-specific evidence, that compliance with

[17] *Save the Agoura Cornell Knoll v City of Agoura Hills* (2020) 46 Cal.App.5th 665, 690; *Citizens for Responsible & Open Gov't v City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1340; *Friends of "B" St. v City of Hayward* (1980) 106 Cal.App.3d 988*; Architectural Heritage Ass'n v County of Monterey* (2004) 122 Cal.App.4th 1095, 1109.
[18] CEQA Guidelines § 15064(g).
[19] SAFER CA IS/MND Comments at pp. 7-8.
[20] RTCs at pp. RTC-4 to RTC-5.

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existing regulatory requirements will be sufficient to reduce potential air quality and hazard impacts to less than significant.[21]

Under CEQA, an agency may not rely on regulatory compliance alone to dismiss potential environmental impacts as insignificant without providing substantial evidence demonstrating how those regulations will effectively mitigate the specific impacts of the project.[22] Here, neither the IS/MND nor the RTCs include any project-specific analysis of the risks or consequences associated with accidental release of hazardous material. Critically, the IS/MND fails to evaluate whether the proposed Project meets BAAQMD thresholds for projects involving acutely hazardous air emissions.

BAAQMD recommends that a project be deemed to have a potentially significant air quality impact if it could expose receptors to concentrations at or above Emergency Response Planning Guidelines (ERPG) Level 2 thresholds.[23] ERPG-2 is defined as "the maximum airborne concentration below which it is believe that nearly all individuals could be exposed for up to one hour without experiencing or developing irreversible or other serious health effects or symptoms which could impair an individual's ability to take protective action."[24]

1-3 Cont.

The City provides no analysis evaluating whether a reasonably foreseeable accidental release of hydrogen chloride, sulfuric acid, and chlorine could result in

[21] *Ibid.*
[22] *See Save Our Capital! V. Department of Gen. Servs.* (2023) 87 Cal.App.5th 655, 696 (agency could not rely on compliance with LEED and CAL-Green building standards to mitigate light and glare impacts in absence of project-specific analysis of impacts and effect of compliance); *Californians for Alternatives to Toxics v. Department of Food & Agric.* (2005) 136 Cal.App.4th 1 (EIR failed to analyze environmental and health risks of crop disease control program and instead presumed that no adverse impacts would occur form use of pesticides in accordance with the registration and labeling program of the California Department of Pesticide Regulation).
[23] Bay Area Air Quality Management District, Air Quality Guidelines (2022) p. 3-4, *available at* https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-3-thresholds_final_v2-pdf.pdf?rev=a976830cce0c4a6bb624b020f72d25b3&sc_lang=en.
[24] Office of Response and Restoration, Emergency Response Planning Guidelines (ERPGs), https://response.restoration.noaa.gov/oil-and-chemical-spills/chemical-spills/resources/emergency-response-planning-guidelines-erpgs.html (last updated Aug. 16, 2023) (hereinafter "NOAA ERPGs").

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exposures that exceed ERPG-2 thresholds.[25] In the absence of such analysis, the City's conclusion that air quality and hazard impacts would be less than significant is not supported by substantial evidence.

Dr. Clark performed an OCA using the RMP*Comp tool developed by the U.S. Environmental Protection Agency.[26] Assuming the presence of 1,000 pounds of chlorine – the estimated maximum quantity present at one time given the facility's ability to process 3 tons of chlorine per hour – the modeling results indicate that an accidental release could affect receptors up to 0.9 miles from the Project site, encompassing numerous public receptors.[27] Further, Dr. Clark notes that in the event of a catastrophic failure, such as a rupture in pressurized equipment, the release could exceed the routine process volume.[28] Therefore, Dr. Clark modeled a release scenario involving up to 2,000 pounds of chlorine.[29] These results show potential impacts extending up to 1.3 miles from the site, affecting businesses, residences, and other sensitive receptors.[30]

1-3 Cont.

Dr. Clark's expert analysis constitutes substantial evidence supporting a fair argument that operation of the proposed Project may result in potentially significant air quality and public health impacts due to the accidental release of chlorine gas. Consequently, the City must prepare an EIR that fully discloses, analyzes, and mitigates these risks before approving the Project.

B. Substantial Evidence Supports a Fair Argument of Significant Impacts from Soil Contamination

SAFER CA commented that the soil underlying the Project site may be contaminated due to prior chemical releases or spills on-site or in the surrounding area.[31] SAFER CA's comments are supported by Dr. Clark's analysis and

1-4

[25] See American Industrial Hygiene Association, Emergency Response Planning Guideline Values (ERPGs) (Spring 2022) pp. 5, 8, 11, *available at* https://aiha-assets.sfo2.digitaloceanspaces.com/AIHA/resources/ERPG-Chemicals-List-REV-2022.pdf.
[26] Clark Supplemtnatl Comments at pp. 4-7; *see also* U.S. Environmental Protection Agency, RMP*Comp, https://www.epa.gov/rmp/rmpcomp (last updated May 8, 2025).
[27] Clark Supplemental Comments at pp. 4-6.
[28] *Id*. at pp. 5-6.
[29] *Ibid*.
[30] Clark Supplemental Comments at pp. 6-7.
[31] SAFER CA IS/MND Comments at pp. 5-7.

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monitoring data which demonstrated significant soil and groundwater contamination in areas surrounding the Project site.[32]

Construction would involve demolition of 27,000 square feet of existing pavement and excavation of 16,000 cubic yards of soil.[33] The City asserts that there is no evidence of soil or groundwater contamination resulting from historical or current site operations.[34] However, the City has not conducted any site-specific investigation.[35] Instead, the City notes that the project area is largely a paved parking lot that has remained ungraded for approximately 23 years.[36] However, this explanation overlooks the fact that the Corteva complex has been in operation for over 68 years.[37] Indeed, the IS/MND, Staff Report, and RTCs all acknowledge that the Corteva complex has engaged in chemical use and production for many decades and has been on the Cortese list for past releases that led to documented soil and groundwater contamination.[38]

1-4 Cont.

Moreover, even in paved areas, subsurface contamination can persist, as many chemical contaminants are not mitigated by surface coverage and can remain in soil and groundwater for decades.[39] The City fails to provide any evidence demonstrating that on-site or nearby activities conducted prior to paving the project site did not result in contamination.[40]

Although the City presents new evidence regarding the status of remediation efforts,[41] this evidence does not establish that groundwater and soil contamination are absent from the Project site. While it may indicate an overall improvement, it does not refute the likelihood that hazardous contaminants remain beneath the Project site, particularly given the documented presence of persistent contaminants in the surrounding area.[42] The City lacks supporting evidence to conclude soil contamination impacts are less than significant.

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[32] *Ibid.*; *id.*, attach. A at pp. 6-10 (hereinafter "Clark IS/MND Comments").
[33] Draft IS/MND at p. 12.
[34] Staff Report at pp. 6-7; RTCs at pp. RTC-3 to RTC-4.
[35] Clark Supplemental Comments at p. 4.
[36] Staff Report at p. 7; RTCs at p. RTC-4.
[37] Clark Supplemental Comments at p. 4.
[38] *Ibid.*
[39] *Ibid.*
[40] *Ibid.*
[41] RTCs at p. RTC-3 to RTC-4.
[42] Clark Supplemental Comments at p. 4.

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SAFER CA also commented that the IS/MND improperly classifies the proposed SMP as a project design feature rather than as a legally enforceable mitigation measure.[43] The City's response states that a SMP would be developed, submitted to the City for approval, and implemented if unanticipated soil contamination is encountered.[44] However, the City fails to identify any legal requirement mandating submission or City approval of an SMP. Moreover, while the City asserts the SMP would be treated as a condition of project approval,[45] neither the draft resolution nor the Mitigation Monitoring and Reporting Program ("MMRP") includes such a requirement.

Under CEQA, mitigation measures must be enforceable through legally binding mechanisms such as conditions of approval, contracts or other enforceable instruments.[46] This requirement ensures that mitigation measures are not merely aspirational but are actually implemented.[47] A project proponent's voluntary agreement to perform mitigation is not sufficient; the lead agency must adopt the mitigation measure in a manner that is legally enforceable.[48]

1-4 Cont.

In this case, the SMP is not integrated into any legally binding approval documents. Without inclusion in the MMRP or conditions of approval, the SMP remains speculative and unenforceable.[49] As a result, the City cannot lawfully conclude that potential impacts from soil contamination would be mitigated to less than significant.

In sum, the City lacks substantial evidence to support the conclusion that hazard impacts are less than significant because it failed to conduct a site-specific analysis of potential soil contamination and did not adopt legally enforceable measures to mitigate potentially significant impacts.

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[43] SAFER CA IS/MND Comments at pp. 8-9.
[44] Staff Report at p. 7; RTCs at p. RTC-6.
[45] *Ibid*.
[46] Pub. Res. Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2).
[47] *Federation of Hillside & Canyon Ass'n v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1260-61.
[48] *Woodward Park Homeowners Ass'n v. City of Fresno* (2007) 150 Cal.App.4th 683, 730.
[49] *See Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1030 (if transportation corridor is not built, "we are dealing with a different project").

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C. The IS/MND Fails to Analyze Acute Health Risks from Diesel Particulate Matter

The IS/MND and associated health risk assessments address carcinogenic and chronic hazard impacts from diesel particulate matter ("DPM"), but it fails to evaluate potential *acute* hazard impacts.[50] This omission violates CEQA's requirement that an initial study include a sufficient degree of analysis to enable informed decisionmaking.[51]

While the California Office of Environmental Health Hazard Assessment ("OEHHA") has not established an acute REL for DPM,[52] this does not relieve the City of its obligation to assess whether the Project may result in significant acute health risks. CEQA requires analysis of all substantial evidence showing a potentially significant impact, even where no formal threshold has been adopted.[53]

The need to evaluate acute impacts is especially compelling for on-site construction workers and other nearby receptors who may experience short-term, high-concentration exposures to DPM.[54] Scientific literature since OEHHA's 1998 assessment has further documented acute respiratory effects from diesel exhaust.[55] For example, Health Canada has proposed an acute REL of 10 μg/m^3 for diesel exhaust based on peer reviewed studies demonstrating short-term respiratory impacts.[56] This REL constitutes substantial evidence of potential acute health hazards from DPM exposure.[57]

1-5

CEQA permits agencies to rely on reasonable assumptions and expert opinion when supported by substantial evidence.[58] Here, the Health Canada REL provides a scientifically credible basis for assessing acute health risks that the City entirely

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[50] Clark Supplemental Comments at pp. 3-4.
[51] CEQA Guidelines § 15151; *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 356.
[52] CEQA Guidelines § 15064(b)(2).
[53] *Protect the Historic Andor Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1111.
[54] Clark Supplemental Comments at p. 3.
[55] *Ibid.*
[56] *Ibid.*; *see also* Health Canada, Human Health Risk Assessment for Diesel Exhaust (Mar. 2016) p. 11 (hereinafter "Health Canada Report"), *available at* https://publications.gc.ca/collections/collection_2016/sc-hc/H129-60-2016-eng.pdf.
[57] *Ibid.*
[58] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 392, 410.

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overlooks. Because the City fails to evaluate whether construction-related DPM emissions could pose significant acute health risks, its conclusions that air quality impacts are less than significant lack evidentiary support. The City must prepare an EIR to fully disclose, analyze, and mitigate these potentially significant acute health impacts as required by with CEQA.

1-5 Cont.

IV. THE PLANNING COMMISSION CANNOT MAKE THE NECESSARY LAND USE FINDINGS DUE TO SIGNIFICANT, UNMITIGATED PUBLIC HEALTH AND ENVIRONMENTAL IMPACTS

The proposed Project is seeking the Planning Commission's approval of a use permit and design review application. To approve the use permit, the Planning Commission must find that the proposed use is not detrimental to the health, safety, and general welfare of the City.[59] However, based on the evidence discussed in Section III,[60] the Planning Commission cannot lawfully make the required findings because the Project would result in significant, unmitigated public health and environmental impacts. The Planning Commission cannot approve the Project until it adequately discloses, analyzes, and mitigates all potentially significant impacts.

1-6

V. CONCLUSION

Substantial evidence supports a fair argument that the Project may have a significant environmental effect, necessitating the preparation of an EIR. The defects with the IS/MND's analysis of air quality, public health, and hazard impacts underscore the potential for significant environmental impacts that have not been sufficiently addressed. Moreover, the City cannot make the required findings to approve the requested entitlements.

1-7

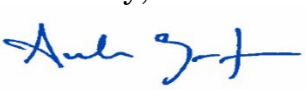
Given these inadequacies, an EIR is necessary to thoroughly evaluate and mitigate the Project's environmental impacts, ensuring compliance with CEQA and the protection of the public health and the environment.

[59] Pittsburg Municipal Code § 18.16.040.
[60] *See generally* SAFER CA IS/MND Comments; Clark IS/MND Comments; Clark Supplemental Comments.

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Thank you for consideration of these comments.

Sincerely,

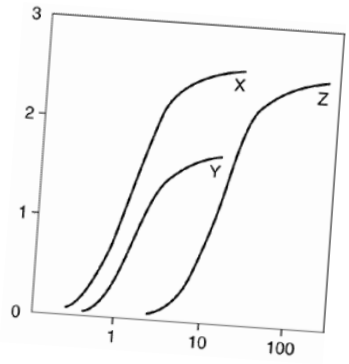


Andrew J. Graf

Attachments
AJG:acp

7788-004acp

ATTACHMENT A



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June 23, 2025

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Attn: Mr. Andrew Graf

Subject: Response To Comments On Draft Initial Study/Mitigated Negative Declaration For Pencco Iron Salts Manufacturing Facility, City of Pittsburg, California SCH No. 2025010603

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed materials related to Response To Comments (RTCs) prepared by the City of Pittsburg (the City) dated April 8, 2025.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the RTCs. If we do not comment on a specific item this does not constitute acceptance of the item.

Specific Comments

1. The IS/MND Cannot Conclude Soil Contamination Is Absent From The Project Site.

The City's argument that there is no evidence of soil or groundwater contamination beneath the subject Project area is specious at best. The City's conclusion is not based on the results of any site-specific investigation as there is no evidence of soil or groundwater samples collected directly from the Project site. Without a site-specific investigation, the City cannot conclude that the Project site is contamination free.

The evidence does show that the Corteva complex has engaged in chemical use and production for many decades and has been on the Cortese list for past releases that led to documented soil and groundwater contamination. Publicly available data from investigations of parcels surrounding the Project site clearly show that residual soil and groundwater contamination – including hydrocarbons, metals, and pesticides – existed prior to remediation efforts. Since the efficacy of the remediation cannot be ascertained until an investigation is performed at the parcel, the lack of evidence does not support the inference that the site is free of contaminated soils.

1-8

The City's claim that Project site is unlikely to contain any soil contamination because it is largely paved and has remained ungraded for approximately 23 years is uncompelling. This explanation overlooks the fact that the Corteva complex has been in operation for over 68 years. It also ignores the fact that subsurface contamination can persist even in paved areas as many chemical contaminants are not mitigated by surface coverage and can remain in soil for decades. The City fails to provide any evidence demonstrating that on-site or nearby activities conducted prior to paving at the Project site did not contaminate the soil where construction activities are proposed to occur.

Given that the IS/MND has documented that the "Construction would require the export of 16,000 cubic yards of soil to make room for the recessed concrete containment floor. Demolition would consist of removing 27,000 square feet of existing pavement to make room for the new concrete containment area and truck scales",[1] it is clear onsite construction workers may be exposed to harmful contaminants in the currently covered soils. Therefore, the City's conclusion that workers would not be exposed to soil contamination is unsupported by evidence in the record. Soil contamination impacts are potentially significant due to the historical presence of highly toxic contaminants in the areas

[1] ISMND. Pg 12

1-8 Cont.

surrounding the Project site and the lack of any site-specific investigation confirming that hazards are not present.

2. The Revised HRA Fails To Assess the Acute Health Impacts To Construction Worker Exposure Due To Exposure To Diesel Particulate Matter Emissions.

According to the Revised HRA, it was completed for the Project to evaluate the health impacts on nearby sensitive receptors. The HRA focused on health impacts on existing residences, offsite workers, and educational facilities from emissions of toxic air contaminants (TAC)[10] such as diesel particulate matter (DPM)[11] from diesel equipment and haul truck emissions associated with the Project construction activities and operational air toxics emissions from haul trucks, the cooling tower, and the scrubber.[2] However, the HRA failed to analyze the most heavily impacted receptors in the area: construction workers on the Project site.

1-9

There are three types of health impacts analyzed in health risk assessments – cancer, chronic, and acute. Short-term exposures of 1–hour, known as acute exposures, are routinely evaluated using Reference Exposure Levels (RELs). An acute REL "is an exposure that is not likely to cause adverse health effects in a human population, including sensitive subgroups, exposed to that concentration (in units of micrograms per cubic meter or µg/m3) for the specified exposure duration on an intermittent basis."[3] While the IS/MND evaluated the cancer and chronic health impacts to off-site receptors from construction and operational DPM emissions, it did not analyze acute DPM impacts for any receptor.

Although the Office of Environmental Health Hazard Assessment (OEHHA) has not established an acute REL for DPM, it is standard practice to conduct a literature search to determine if other authorities have established a threshold. Since OEHHA last evaluated health impacts of DPM in 1998, substantial additional research has been conducted on acute health impacts of DPM. For example, Canada has established an acute REL for DPM of 10 µg/m3 to protect against adverse effects on the respiratory system.[4] The IS/MND should evaluate the acute impact of DPM on construction workers and nearby off-site workers using this acute REL.

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[2] City of Pittsburg. RTCs. 2025. Pg RTC-6.

[3] OEHHA, Guidance Manual for Preparation of Health Risk Assessments. February 2015. Pg. 6-3. https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.

[4] Government of Canada. Human Health Risk Assessment for Diesel Exhaust. March 4, 2016. http://publications.gc.ca/collections/collection_2016/sc-hc/H129-60-2016-eng.pdf.

1-9 Cont.

Based on my experience in many other projects with similar construction activities, equipment and timeline, acute health impacts to on-site construction workers from exposure to DPM emissions during Project construction are typically significant and unmitigated.

3. The City Fails To Analyze Potential Impacts From The Accidental Release Of Chlorine.

The IS/MND asserts that potential chlorine releases from the Project site would be less than significant yet fails to support its claim with any site-specific risk assessment for chlorine gas exposure. The Project will handle 40 million pounds of chlorine annually via the 120 foot of pipeline that would be added to the existing line at the rail car spot adjacent to F Street from the east.[5] Using the City's estimate of chlorine usage onsite, the pipeline would need to transfer 3 tons of chlorine per hour from the existing source at Corteva. This equates to a transfer rate of 100 lbs per minute or 0.05 tons per minute (3 tons or 6,000 lbs divided by 60 minutes).

1-10

TABLE 1 INCOMING FEEDSTOCK QUANTITITES (TONS)

Commodity	Hourly	Daily	Annual
Iron Ore	6	154	40,000
Scrap Steel	2	46	12,000
Hydrochloric Acid	6	154	40,000
Sulfuric Acid	3	77	20,000
Chlorine	3	77	20,000
Liquid Oxygen	0.33	8	2,000
Sodium Hydroxide	0.08	2	600

SOURCE: Pencco, 2024.

Under Section 112(r) of the Clean Air Act Amendments requires EPA to publish regulations and guidance for chemical accident prevention at facilities that use certain hazardous substances. These regulations and guidance are contained in the Risk Management Program (RMP) rule. The RMP rule requires facilities that use extremely hazardous substances to develop a Risk Management Plan which:

- identifies the potential effects of a chemical accident,
- identifies steps the facility is taking to prevent an accident, and
- spells out emergency response procedures should an accident occur.

BAAQMD recommends using NOAA's Emergency Response Planning Guidelines (ERPGs)

[5] City of Pittsburg. RTC. 2025. Pg 2.

to estimate the concentrations at which most people will begin to experience health effects if they are exposed to a hazardous airborne chemical for 1 hour.[6] (Sensitive members of the public—such as old, sick, or very young people—aren't covered by these guidelines and they may experience adverse effects at concentrations below the ERPG values.).[7] A chemical may have up to three ERPG values, each of which corresponds to a specific tier of health effects. The three ERPG tiers are defined as follows:

- **ERPG-3** is the maximum airborne concentration below which nearly all individuals could be exposed for up to 1 hour without experiencing or developing life-threatening health effects.
- **ERPG-2** is the maximum airborne concentration below which nearly all individuals could be exposed for up to 1 hour without experiencing or developing irreversible or other serious health effects or symptoms which could impair an individual's ability to take protective action.
- **ERPG-1** is the maximum airborne concentration below which nearly all individuals could be exposed for up to 1 hour without experiencing more than mild, transient adverse health effects or without perceiving a clearly defined objectionable odor.

BAAQMD recommends that the lead agency, in consultation with the appropriate administering agency, find that a project would result in a significant air quality impact if it would expose receptors to concentrations at or above ERPG-2 thresholds.[8]

1-10 Cont.

In response to the need for rapidly assessing the potential offsite risks from accidental releases of chemicals, NOAA and USEPA developed the RMP*Comp software system. Potential exposure is derived based on the time frame in which the release occurs (duration), the volume of materials released (quantity), and the wind flow during the release. RMP*Comp uses a default duration of 10 minutes and a default wind speed of 1.5 meters per second.

Quantity is based on the release of the largest quantity of a regulated substance in a vessel or pipe. Because the IS/MND does not provide enough information to regarding the quantities of chlorine in the proposed pipelines and tanks, a reasonable estimate for an accidental release over a 10-minute duration can be derived by considering both process rates and potential release scenarios. At a steady

[6] BAAQMD CEQA Air Quality Guidelines, Pg. 3-4.

[7] Office of Response and Restoration. Emergency Response Planning Guidelines (ERPGs). Aug. 16, 2023. https://response.restoration.noaa.gov/oil-and-chemical-spills/chemical-spills/resources/emergency-response-planning-guidelines-erpgs.html.

[8] BAAQMD CEQA Air Quality Guidelines, Pg. 3-4.

process rate, approximately 0.5 tons of chlorine would be handled during a 10-minute window given that the IS/MND estimates the proposed facility processes 3 tons of chlorine gas per hour.

However, in the event of an accidental release, particularly one involving a rupture in pressurized equipment, the actual quantity released could exceed the routine process flow. While a full vessel failure could release several tons instantaneously, more typical release scenarios, such as a pipe or valve rupture, are likely to result in lower but still significant emissions. A release of up to 1 ton of chlorine over 10 minutes is a conservative but reasonable assumption. This estimate accounts for the potential rapid volatilization of liquefied chlorine upon depressurization, the absence of immediate mitigation, aligns with common parameters used in risk assessments, and is consistent with recent accidental chlorine releases.[9]

Assuming a release of 0.5 tons, it is clear from the RMP*Comp software that a release from the chlorine extension would result in a plume above the ERPG-2 threshold that would extend 0.9 miles or 1.4 kms, offsite to the Pittsburg-Antioch Highway, impacting many off-site businesses. Increasing the release to 1 ton, the plume of chlorine gas exceeding the ERPG-2 threshold would extend to 1.3 miles or 2.1 kms, impacting numerous businesses, residences, and other sensitive uses.

1-10
Cont.

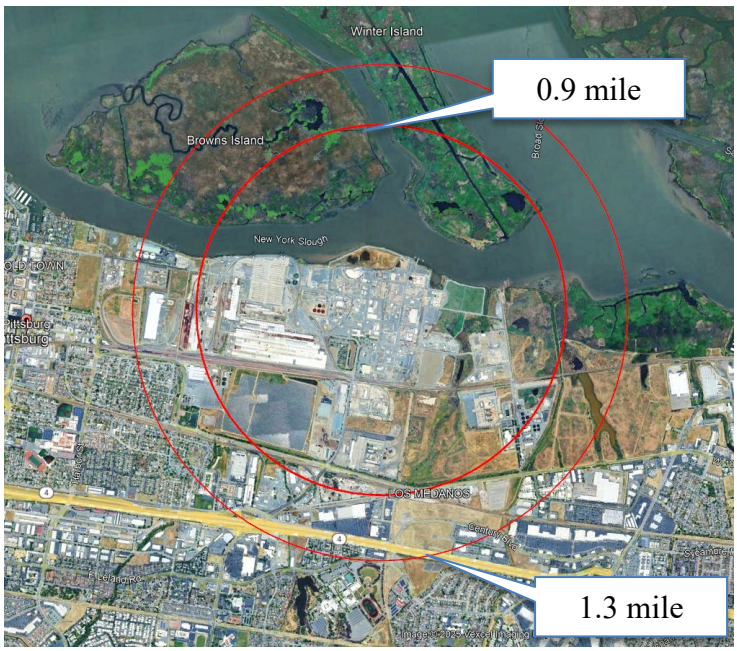


Figure 3: Extent Of Chlorine Released Based On RMP*Comp

[9] An emissions report submitted to the Texas Commission on Environmental Quality shows that 8,011 pounds of chlorine was released from a piping component during a 48-minute period on May 21, 2025. This equates to approximate 1,666 lbs every ten minutes. https://www2.tceq.texas.gov/oce/eer/index.cfm?fuseaction=main.getDetails&target=440861.

Because the accidental release of chlorine exceeds BAAQMD's recommend threshold for off-site workers, nearby residents, and other public receptors, the impact is potentially significant.

1-10 Cont.

Conclusions

The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant impacts if allowed to proceed. A draft environmental impact report should be prepared to address these substantial concerns.

Sincerely,



Attachments

EPA United States Environmental Protection Agency

RMP*Comp

RMP*Comp

Back

Estimated Distance Calculation

Estimated distance to toxic endpoint: 0.9 miles (1.4 kilometers)

This is the downwind distance to the toxic endpoint specified for this regulated substance under the RMP Rule. Report all distances shorter than 0.1 mile as 0.1 mile, and all distances longer than 25 miles as 25 miles.

Scenario Summary

Chemical:	Chlorine
CAS number:	7782-50-5
Threat type:	Toxic Gas
Scenario type:	Worst-case
Physical state:	Liquefied under pressure
Quantity released:	0.5 tons
Release duration:	10 min
Release rate:	100 pounds per minute
Mitigation measures:	NONE
Surrounding terrain type:	Urban surroundings (many obstacles in the immediate area)
Toxic endpoint:	0.0087 mg/L; basis: ERPG-2

Assumptions about this scenario

Wind speed:	1.5 meters/second (3.4 miles/hour)
Stability class:	F
Air temperature:	77 degrees F (25 degrees C)

EPA United States Environmental Protection Agency

RMP*Comp

RMP*Comp

Back

Estimated Distance Calculation

Estimated distance to toxic endpoint: 1.3 miles (2.1 kilometers)

This is the downwind distance to the toxic endpoint specified for this regulated substance under the RMP Rule. Report all distances shorter than 0.1 mile as 0.1 mile, and all distances longer than 25 miles as 25 miles.

Scenario Summary

Chemical:	Chlorine
CAS number:	7782-50-5
Threat type:	Toxic Gas
Scenario type:	Worst-case
Physical state:	Liquefied under pressure
Quantity released:	1 tons
Release duration:	10 min
Release rate:	200 pounds per minute
Mitigation measures:	NONE
Surrounding terrain type:	Urban surroundings (many obstacles in the immediate area)
Toxic endpoint:	0.0087 mg/L; basis: ERPG-2

Assumptions about this scenario

Wind speed:	1.5 meters/second (3.4 miles/hour)
Stability class:	F
Air temperature:	77 degrees F (25 degrees C)

Response to Comment 1-1

See Response to Comment 1-3, 1-4 and 1-5.

Response to Comment 1-2

See Response to Comment 1-3, 1-4 and 1-5.

Response to Comment 1-3

The Project would use various chemical compounds in its operation, as described in the Draft IS/MND (pages 5 and 55) and of these compounds, three are on California's regulated substances list for accidental release prevention.[1] Sulfuric acid, hydrogen chloride, and chlorine (gas) would be used on the Project site (considered a "stationary source" [2] by CalARP) in quantities that could exceed the State thresholds. As described in the Draft IS/MND (page 5), chlorine used in the processes would be transported onto the Project site via existing Corteva owned and operated pipelines and would be connected to the Pencco operations through a 40-foot extension pipeline. The HCL would be transported to the facility initially by tanker truck and then by pipeline once an HCL pipeline is available. The HCL pipeline from Corteva would be extended from the existing line adjacent to F Street and would require approximately 120 feet of piping to the Project tie in point. Sulfuric acid would be transported by tanker truck and stored onsite.

As described in the Draft IS/MND (page 54) the Consolidated Unified Program Agency (CUPA) is the Contra Costa Health Services Hazardous Materials Programs (CCHSHMP) for the City of Pittsburg. In accordance with the California Health and Safety Code, Chapter 6.95, Article 2, Sections 25531-25543.3 and Title 19 of the California Code of Regulations (CCR), Division 2, Chapter 4.5. – "CalARP Program Regulations", the CUPA would require Pencco to complete a Risk Management Plan (RMP) for its facility independent of the RMP that currently exists for the Corteva site. The RMP would include a process hazard analysis (PHA) (CCR Title 19 §5100.2) and an offsite consequences analysis (OCA) (CCR Title 19 § 5070.2). The PHA shall identify, evaluate, and control the hazards involved in chemical processing while the OCA, as noted in the Draft IS/MND (page 54), would assist in determining the facility's program level,[3] specify required protocols for chemical hazard analysis, and develop various management plans for routine and non-routine situations involving the subject chemicals. As mentioned by Dr. Clark in his comment, consistent with the CalARP guidance on evaluating a worst-case release scenario, modeling would be required to assess the potential impact from an accidental release of chlorine from the Corteva pipeline extension on the Project site and at the reactor vessels that use chlorine, if deemed necessary. The chemical release estimate would be based on the maximum quantity of chlorine gas in the process that could be released during a catastrophic pipeline or storage vessel rupture.

In summary, as required by law, Pencco would prepare an RMP to develop protocols to reduce the potential for the release of hazardous materials and response actions that would protect workers and the public if a release were to occur. The CUPA would ensure that Pencco complete the RMP process prior to issuing its permit to operate. The Draft IS/MND does not defer the analysis of significant hazardous

[1] Title 19. Public Safety, Division 5. California Environmental Protection Agency, Chapter 2. California Accidental Release Prevention (CalARP) Program Detailed Analysis, Article 9. Regulated Substances for Accidental Release Prevention 19 CCR § 5130.6 Table 3.

[2] Stationary source is defined as "any buildings, structures, equipment, installations, or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur.

[3] In the (CalARP) program, "program levels" refer to categories that determine the level of detail and requirements for a facility's Risk Management Plan (RMP), based on the potential for accidental releases and their impact.

materials; rather, it presents the types and quantities of the chemical compounds and accurately describes the regulatory structure that is required by the State of California and the CUPA to ensure that the proposed facility operates in compliance with regulations that reduce the potential for significant adverse impacts associated with transport, storage and use of hazardous chemicals.

The Project's required compliance with CalARP regulations would effectively mitigate a reasonably foreseeable accidental release of hydrogen chloride, sulfuric acid, or chlorine through the development of the required RMP and associated OCA, management systems requirements, prevention programs, and emergency response programs. Review and approval by the CCHSHMP would ensure the Project's compliance with CalARP and audits would occur for the lifetime of the Project at least once every three years.

Furthermore, the location of the Project is designed to effectively mitigate a reasonably foreseeable accidental release of hazardous materials as it is situated within Corteva's approximately 200-acre developed industrial complex along with other facilities that use hazardous substances such as chemical manufacturing plants and is sited greater than one mile from sensitive receptors (residences, schools, etc.).

Response to Comment 1-4

The analysis conducted for the Draft IS/MND found no evidence indicating that the Project site currently, or previously, supported operations that could have caused soil and groundwater contamination beneath the parcel. The Corteva Agriscience Industrial Complex (Corteva property) has been involved in chemical use and production for many decades and is included on the "Cortese List" due to past releases that led to soil and groundwater contamination. However, the Project site itself has not been identified on regulatory databases nor have soil and groundwater investigations been mandated by regulatory agencies. The Project site, which consists mostly of a paved parking lot, has been in its current configuration for at least 23 years.

Groundwater beneath the Corteva property occurs in two water-bearing zones: the upper-sand interval [approximately 40 to 85 feet below ground surface (bgs)] and lower-sand interval (approximately 110 to 135 feet bgs)[4]. The State Water Resources Control Board's (SWRCB) Geotracker database contains information on the investigation and remediation activities at the Corteva property. [5] These files indicate that certain sites to the north and in a downgradient groundwater flow direction from the Project site experienced past releases of volatile organic compounds (VOCs) that reached the underlying soil and groundwater. Modeled contaminant plumes appear to have at one time primarily occupied the areas in the northern half of the Corteva property.[6] As discussed in the Draft IS/MND (page 52), VOC contamination was identified in the upper and lower groundwater aquifers. In response to the groundwater contamination and subsequent regulatory requirements, Corteva has been operating an on-site Enhanced In-Situ Bioremediation (EISB) system for groundwater remediation since March 2020.

In his April 2025 comments on the Draft IS/MND, Dr. James Clark of Clark and Associates cited information from the SWRCB Geotracker database for groundwater monitoring wells 408B1, located approximately 360 feet northwest of the Project site, and 424B and C, located 800 feet to the northeast. In his comments, Mr. Clark stated that, "*wells closest to the Project site (408B1 and 424C) indicate the presence of multiple hazardous contaminants, including carcinogens such as cis-1,2-dichloroethene,*

[4] Former Dow Chemical Company Facility, Pittsburg, California 2020 Annual Self-Monitoring Report Self-Monitoring Program Site Cleanup Requirements Order No. R2-2019-0029 Final February 2021. Prepared by Jacobs Engineering Group for The Dow Chemical Company.

[5] SWRCB Geotracker Database. 2025. Result for Dow Chemical Pittsburg Facility, (SL20210828). https://geotracker.waterboards.ca.gov/profile_report?global_id=SL20210828&mytab=esidata#esidata. Accessed March 2025.

[6] Former Dow Chemical Company Facility, Pittsburg, California 2020 Annual Self-Monitoring Report Self-Monitoring Program Site Cleanup Requirements Order No. R2-2019-0029 Final February 2021. Prepared by Jacobs Engineering Group for The Dow Chemical Company.

trichloroethene (TCE), tetrachloroethylene (PCE), methylene chloride, carbon tetrachloride, chloroform, vinyl chloride, and benzene". He then attempted to illustrate this by reporting that, "*the **current*** [emphasis added] *concentration of PCE in the shallow wells nearest the Project site were measured at 4,200 ug/L in Well 408B1, 120 ug/L at Well 424C, and 130 ug/L at Well 424B and the concentrations of TCE in Wells 408B1, 424C, and 424B were measured at 66 ug/l, 482 ug/L, and 14 ug/L, respectively."* These concentrations do not represent current data and are inconsistent with those reported in the Geotracker database from April 2024, the most current data available.[7] Geotracker reported concentrations of PCE in monitoring well 424C and 424B at 0.2 µg/L and TCE in monitoring well 424C at 0.31 µg/L and 1.0 µg/L in monitoring well 424B. These concentrations are far lower than the so called "current" data erroneously reported by Dr. Clark and considerably lower than the Environmental Screening Levels for groundwater set forth by the SWRCB for PCE (3.0 µg/L) and TCE (5.0 µg/L). Furthermore, as reported by Dr. Clark, PCE was detected in monitoring well 408B1 at 4,200 µg/L and TCE was detected at 66 µg/L, however, those data are not current; they were reported in April 2019, almost 6 years ago—before groundwater remediation began—and the last time well 408B1 was sampled. The groundwater quality data collected in April 2024 show that since the EISB system went online in 2020, it has been effective in decreasing concentrations of VOCs in the upper and lower sand intervals beneath the Corteva site.[8] These data contradict Dr. Clark's assertion that there are multiple hazardous contaminants in close proximity to the Project site.

The 2020 Self-Monitoring Program Report provides groundwater contamination plume maps that project the size and location of plumes associated with carbon tetrachloride, chloroform, PCE, TCE, cis1,2 DCE, and vinyl chloride. These projections are based on groundwater data collected in spring 2020 from select monitoring wells. Only the projected extent of the carbon tetrachloride plume is shown to intersect the Project site at a maximum concentration of 1,000 µg/L in the upper sand interval and 100 µg/L in the lower interval. Additionally, apart from the modeled upper sand interval PCE plume approaching the northern Project site boundary, the projected plumes associated with PCE and TCE did not extend beneath the Project site. The contaminant plume maps generated for the 2024 Self-Monitoring Program Report indicate that the contaminant plumes, particularly for carbon tetrachloride, have reduced in size, suggesting that the EISB has been effective in remediating groundwater contaminants.[9] The existing contaminate plumes on the Corteva property remain in a downgradient groundwater flow direction (i.e., the Project site is upgradient from the contaminant source). Groundwater quality data illustrated in the 2020 and 2024 Self-Monitoring Program Reports nullify Dr. Clark's presumption that the elevated PCE and TCE concentrations detected in nearby monitoring well 408B1 represent concentrations beneath the Project site.

Dr. Clark's claim that onsite workers might face harmful indoor air contamination from vapor intrusion during Project operations is unfounded. First, as described above, Dr. Clark presents no credible evidence that the VOCs detected in the offsite groundwater wells are comparable to the groundwater conditions beneath the Project site. Second, the proposed Project would feature a solid concrete floor and would lack a fixed roof, minimizing the risk of vapor entrapment in an enclosed space.

There is no substantial evidence that soil slated for excavation during Project construction is contaminated from past hazardous materials use. However, as discussed in the Draft IS/MND (page 54), a Soil Management Plan (SMP) would be developed and implemented for the construction phase of the

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[7] SWRCB Geotracker Database. 2025. Result for Dow Chemical Pittsburg Facility, (SL20210828). https://geotracker.waterboards.ca.gov/profile_report?global_id=SL20210828&mytab=esidata#esidata. Accessed March 2025.

[8] Former Dow Chemical Company Facility, Pittsburg, California 2020 Annual Self-Monitoring Report Self-Monitoring Program Site Cleanup Requirements Order No. R2-2019-0029 Final February 2021. Prepared by Jacobs Engineering Group for The Dow Chemical Company.

[9] Former Dow Chemical Company Facility, Pittsburg, California January – December 2024 Annual SCR Report, Self-Monitoring Program, Site Cleanup Requirements Order No. R2-2019-0029 Final February 2025. Prepared by Jacobs Engineering Group for The Dow Chemical Company.

Project to reduce potential health risks from unanticipated soils contamination, especially to construction workers.

The SMP, which would be developed and implemented for the construction phase of the Project is a standard best practice for construction in industrial settings and considered a safeguard to protect workers if unanticipated soil contamination is encountered during demolition and grading. The SMP outlines the procedures contractors are to follow if soils contaminated with hydrocarbons, VOCs, or pesticides are encountered during disturbance and removal of onsite soils. The SMP would be prepared and submitted to the City prior to issuance of building permits based on the current understanding of the Project site uses, history, and proposed construction activity. Procedures set forth in the SMP are standard industry accepted protocols, which could include active air monitoring for VOCs, soil sampling, soils segregation, and pre-disposal chemical screening. The final disposition of impacted soil depends on the preliminary screening effort and follow-up laboratory testing as required by the waste-accepting facility. Soil sampling and laboratory analysis for profiling of waste would be performed in coordination with appropriate disposal sites to maximize efficiency in removing material off-site. Handling and disposal of impacted soil would be conducted in accordance with all applicable state and federal laws. These procedures and protocols effectively reduce the risk of worker exposure to hazardous materials and for long term worker exposure during operations. While presented as a Project design feature, the City of Pittsburg would consider the SMP a Condition of Project Approval, requiring its preparation and submittal to the City prior to issuance of building permits.

In summary, there is no substantial evidence to support a fair argument that the proposed Project would result in potentially significant hazard impacts. There is no evidence that historical or current site operations have contaminated soil or groundwater. While the larger Corteva industrial complex has reported soil and groundwater contamination, its extent appears not to have substantially impacted the Project site. The Corteva property has been under active remediation for almost 6 years and current groundwater data indicates the remediation is effective and groundwater concentrations of VOCs are decreasing. As an additional measure to safeguard construction workers during site grading, the SMP, proposed as part of the Project, would be implemented to monitor soil and identify unanticipated contamination

Response to Comment 1-5

The Office of Environmental Health Hazard Assessment (OEHHA) has developed reference exposure levels (RELs) to determine potential non-cancer health impacts from toxic air contaminants (TACs). An REL is used as an indicator of potential non-cancer health impacts and is defined as the concentration at which no adverse non-cancer health effects are anticipated. RELs incorporate uncertainty factors to help ensure that the REL is protective for nearly all individuals, including sensitive populations.[10] RELs (acute and chronic) have been developed for a number of TACs, exposure pathways, and exposure durations. However, OEHHA has not developed an acute REL for diesel particulate matter (DPM); therefore, acute DPM impacts were not evaluated in the Health Risk Assessment and IS/MND. This is consistent with OEHHA Guidance and the California Air Resources Board (CARB) HARP2 Air Dispersion Modeling Program that was used in development of the proposed Project's Health Risk Assessment summarized in the air quality section of the Draft IS/MND and found in Appendix A of the Draft IS/MND, and the revised Health Risk Assessment provided in the April 8, 2025 Response to Comments Document that was published in the Staff Report for the Item on the scheduled June 24, 2025 Planning Commission Agenda.

[10] OEHHA, Air Toxics Hot Spots, Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015, Accessed at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf

BAAQMD Guidance[11] clearly states that worker receptors "Are off-site locations where people work, including indoor and outdoor areas and commercial/industrial areas currently zoned or planned to be zoned for manufacturing, light or heavy industry, office, or retail activity (page E-14)." Future on-site construction workers associated with constructing a proposed Project are not included in health risk assessments. This is consistent with OEHHA Guidance[12] which states "Onsite workers are protected by CAL OSHA and typically are not evaluated under the Hot Spots program. Exceptions may include a worker who also lives on the facility property such as at prisons, military bases, and universities that have worker housing within the facility (page 8-25)." Worker housing is not proposed under the Project and therefore it was appropriate to not consider onsite construction worker impacts in the Draft IS/MND.

Furthermore, DPM impacts were included and analyzed in the Draft IS/MND for off-site receptors and other sensitive receptors, which resulted in the implementation of **Mitigation Measure AQ-2**, which requires construction equipment greater than 25 horsepower to meet Tier 4 Final emissions standards, or electric or alternative-fueled (i.e., non-diesel).

Response to Comment 1-6

See Response to Comment 1-3, 1-4 and 1-5.

Response to Comment 1-7

See Response to Comment 1-3, 1-4 and 1-5.

Response to Comment 1-8

See Response to Comment 1-4.

Response to Comment 1-9

See Response to Comment 1-5.

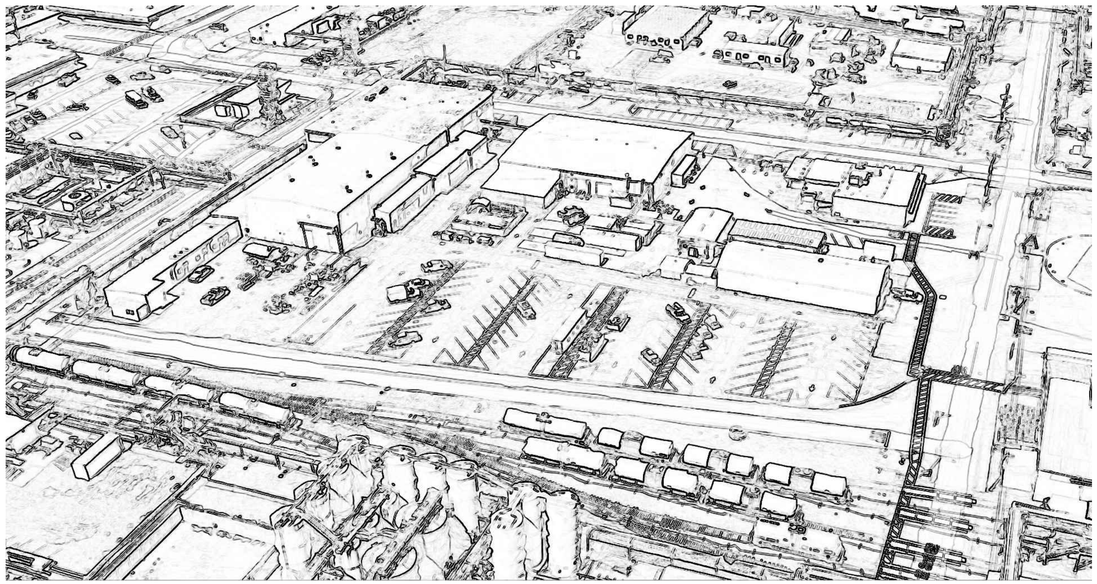
Response to Comment 1-10

See Response to Comment 1-3.

11 BAAQMD, 2022 CEQA Guidelines, Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards, August 2023, Accessed at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?rev=b8917a27345a4a629fc18fc8650951e4&sc_lang=en

12 OEHHA, Air Toxics Hot Spots, Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015, Accessed at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf

ATTACHMENT 3



PLANNING REVIEW SUBMITTAL - REVISION 1

PENCCO - WATER TREATMENT PRODUCTS MANUFACTURING FACILITY

PITTSBURG, CA, JANUARY 10, 2024

PROJECT DIRECTORY:

OWNER

Pencco, Inc
831 Bartlett Road
Sealy, TX 77474

Contact:

Dillon Blaine
Project Engineer
dblaine@pencco.com
| 909 | 747 - 7168

LAND SURVEYER

F3 & Associates, Inc
731 East H Street
Benicia, CA 94510

Contact:

Michael Ferrera
Vice president
Mferreira@f3-inc.com
| 707 | 748 - 4300

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A T E L I E R 424
1575 Treat Blvd. Suite 101
Walnut Creek, CA 94598

Contact:

Sharif Rahimian, AIA
President
sharifr@atelier424.com
| 925 | 414 - 5959

PROJECT DATA:

PROJECT LOCATION:	901 Loveridge Rd., Pittsburg, CA 94565
APN NO:	073-220-049
COMMUNITY PLAN :	Por. Rancho Los Medanos
ZONING CODE:	IG - Industrial General
FLOOD ZONE:	N/A
LOT AREA:	Lot L8 , 1.38 Acres (59,960.6 sq.ft.)
REQUIRED SETBACK:	5'
LOT COVERAGE RQD.:	N/A
Parking RQD.:	(4) Parking Stalls (City of Pittsburg Municipal Code Section 18.78.040)
Parking Stalls Provided.:	(1) Van Accessible + (5) Standard Parking Stalls
Bicycle Parking RQD.:	(0) (City of Pittsburg Municipal Code Section 18.78.045)

PROJECT DATA (continued):

LOT COVERAGE PROPOSED:	Existing
BUILDING AREA:	(E) Building (West of Property): = 4,230 SQ.FT. (E) Building (South ofProperty): = 1,607 SQ.FT. TOTAL Ground Floor: = 5,837 SQ.FT. Containment Area (open): = 22,220 SQ.FT.
CONSTRUCTION:	N/A
OCCUPANCY GROUP:	B, F
APPLICABLE CODES:	2022 California Residential Code 2022 California Building Code 2022 California Mechanical Code 2022 California Plumbing Code 2022 California Fire Code 2022 California Electrical Code 2022 California Energy Code 2022 California Reference Standards Code 2022 California Green Building Code

PROJECT SCOPE:

Objective:
As a national provider of wastewater and drinking water treatment products, Pencco, Inc. has a unique opportunity to build a new manufacturing facility in Pittsburg, California. This new facility would aim to relieve Northern California chemical supply issues which have recently seen a reduction in local manufacturing capabilities during the pandemic. This project would help stabilize the supply of adequate water treatment products and secure safe, clean water for Northern California communities.

Pencco Facility:
Pencco will build an iron salt manufacturing facility on property leased from Corteva. The property is inside the fenced limits of the Corteva industrial complex located in Pittsburg, Ca. The iron salts made at this facility will ship to California's water treatment and wastewater treatment plants. Some locations are less than 20 miles from the facility. The proprty will include an existing building on the west and south to be utilized for office and labratory

Manufacting Process:
The manufacturing process involves dissolving iron ore and high-purity scrap iron with chlorine and hydrochloric Acid (HCL). The Pencco process will consume HCL and chlorine currently produced onsite at Corteva. These processes will not increase the production or consumption of chlorine onsite. Pencco will consume chlorine that is currently consumed by Corteva. Corteva will be shutting down some of its manufacturing operations that consume chlorine. Pencco is building onsite to replace the chlorine consumption of those operations.

This facility will use iron ore (magnetite), scrap steel, and SPL (ferrous chloride) as the raw iron material, which trucks will deliver to the Corteva facility. Pencco will also consume HCL and Chlorine, which Pencco will purchase from Corteva. The chlorine will be transported to the facility by pipeline, all within the Corteva industrial complex. The Chlorine line supplying the Pencco project is currently 20 ft from the project boundaries, so there will only be an addition of about 40 ft of chlorine piping. The HCL will be transported to the facility initially by tanker truck and then by pipeline once the pipeline is available. Pencco will also use 98% sulfuric acid in the iron salts production and LOX. Both will be transported onsite by truck. There will also be a need to consume 50% Sodium Hydroxide (NaOH) in the scrubber maintained by Pencco to control fugitive emissions of HCL and chlorine. NaOH is a corrosive liquid that will deliver by tanker truck.

All wastewater and rainwater in contact with the Pencco processes are consumed as raw material. Our products are at least 50% water once manufactured. Furthermore, the Pencco process will include the Stormwater pollution plan maintained by Corteva.

SHEET INDEX:

A1.0	COVER SHEET
A1.1	VICINITY AND MONUMENT MAP
A1.2	SITE AERIAL PLAN
A1.3	EXISTING SITE AND BUILDINGS PHOTOS
A1.4	PROJECT SITE MASTER PLAN
A2.1	OVERALL FLOOR PLAN
A3.1	EXTERIOR ELEVATIONS
A3.2	EXTERIOR ELEVATIONS
A3.3	EXTERIOR ELEVATIONS
A3.4	EXTERIOR ELEVATIONS - COLOR AND MATERIAL BOARD

PROJECT INFO:

REVISIONS:		
1	CLIENT REVIEW	10 . 16 . 2023
2	PLANNING REVIEW SUBMITTAL	11 . 16 . 2023
3	PLANNING REVIEW SUBMITTAL - R1	01. 10 . 2024

PROJECT NO:	700-2206-02
REVIEWED BY:	SR
DATE/TIME STAMP:	11 . 13 . 2023
SCALE:	N.T.S
ISSUED:	PLANNING REVIEW

LEGAL NOTES:

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CLIENT:

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831 BARTLETT ROAD SEALY, TX, 77474

Water Treatment Products Manufacturing Facility
901 LOVERIDGE ROAD PITTSBURG, CA 94565

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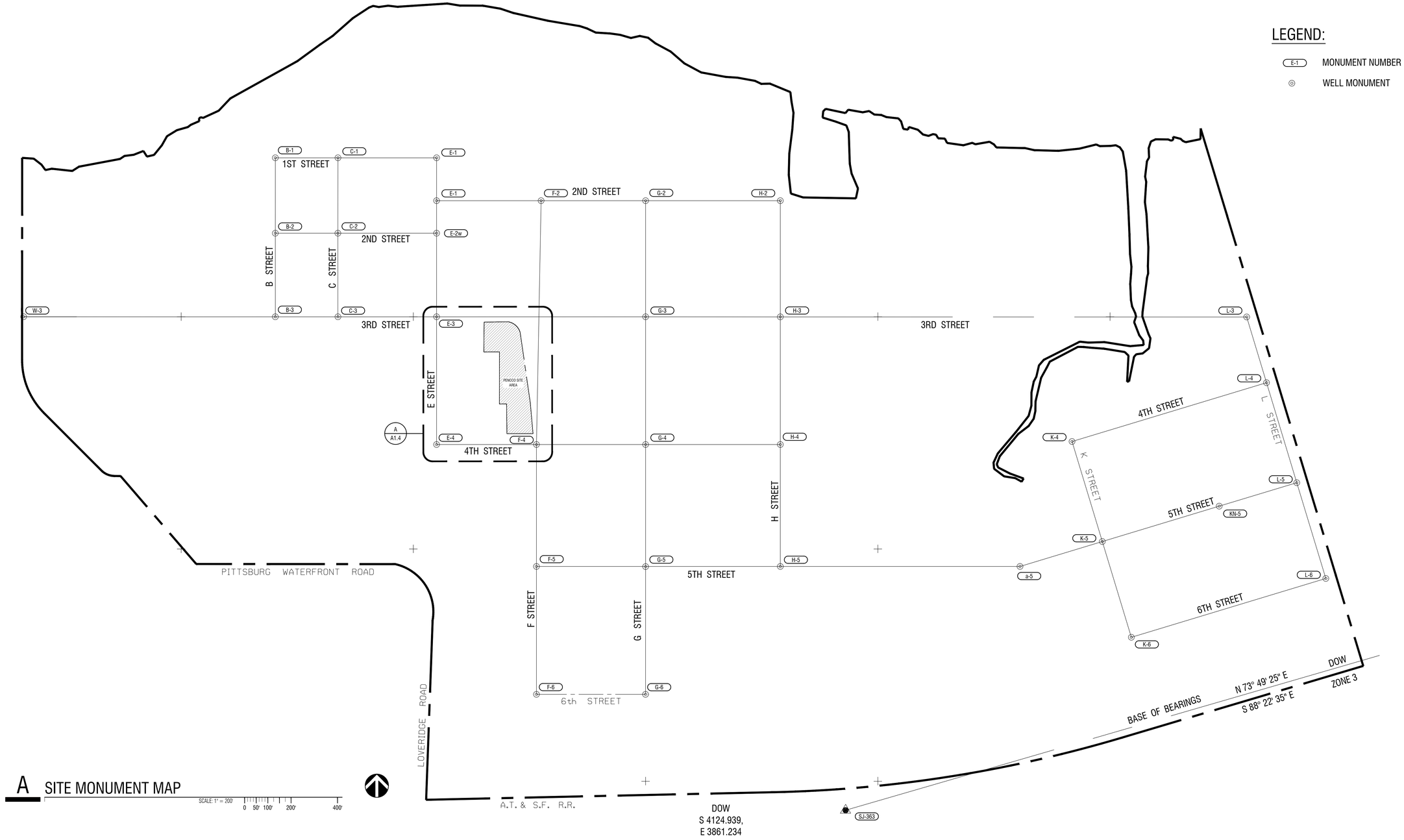
LICENSED ARCHITECT — SHARIF RAHIMIAN — No. C-25912 — Ren. 04-30-2025 — STATE OF CALIFORNIA

SHEET TITLE:

COVER SHEET

SHEET NO:

A1.0



REVISIONS:		
1	CLIENT REVIEW	10 . 16 . 2023
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PROJECT INFO

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LICENSED ARCHITECT
No. C-25912
Ren. 04-30-2025
STATE OF CALIFORNIA

SHEET TITLE

VICINITY MAP
MONUMENT MAP

SHEET NO:

A1.1



PROJECT INFO:

REVISIONS:		
1	CLIENT REVIEW	10 . 16 . 2023
2	PLANNING REVIEW SUBMITTAL	11 . 16 . 2023
3	PLANNING REVIEW SUBMITTAL - R1	01. 10 . 2024

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ARCHITECTURE . INTERIORS . PLANNING

LICENSED ARCHITECT — KYLE T. RATZLAFF — No. C-25912 — Exp. 04-30-2025 — STATE OF CALIFORNIA

SHEET TITLE:

AERIAL MAP

SHEET NO:

A1.2



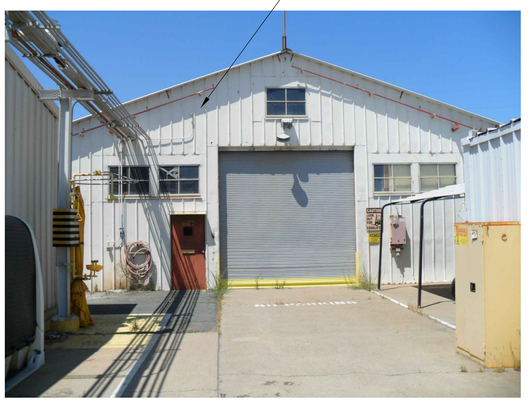
A AERIAL VIEW OF THE PROJECT SITE
SCALE: N.T.S



B PENCCO - EXISTING BUILDING
SCALE: N.T.S



C PENCCO - EXISTING BUILDING
SCALE: N.T.S



D PENCCO - EXISTINGE BUILDING
SCALE: N.T.S



E CORTEVA - EXISTING BUILDING
SCALE: N.T.S



G PENNCO - EXISTING BUILDING
SCALE: N.T.S



F PENCCO - EXISTING BUILDING
SCALE: N.T.S

PROJECT INFO

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LICENSED ARCHITECT
CHRIF RAITH
No. C-25912
Exp. 04-30-2025
STATE OF CALIFORNIA

SHEET TITLE

SITE AND
BUILDING PHOTOS

SHEET NO:

A1.3



A STREET BLOCK SITE PLAN

SCALE: 1" = 30'

0 7.5' 15' 30' 60'

SHEET LEGEND:

- CORTEVA - EXISTING BUILDING
- BLOCK - PAVING AREA
- PENCCO FACILITY - SITE AREA / OPEN AREA
- PENCCO FACILITY - EXISTING BUILDING (MAINTENANCE AND OFFICE)
- PENCCO FACILITY - CONTAINMENT AREA
- PENCCO FACILITY - EXISTING BUILDING (STORAGE AND LAB)

SHEET NOTES AND KEYNOTES

F-3 MONUMENT NUMBER

PROJECT INFO

REVISIONS:		
1	CLIENT REVIEW	10 . 16 . 2023
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PROJECT NO:	700-2206-02
REVIEWED BY:	SR
DATE/TIME STAMP:	11 . 13 . 2023
SCALE:	AS NOTED
ISSUED:	PLANNING REVIEW

LEGAL NOTES:

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CLIENT:

pencco

Pencco, INC.
831 BARTLETT ROAD SEALY, TX, 77474

Water Treatment Products
Manufacturing Facility
901 LOVERIDGE ROAD PITTSBURG, CA 94565

ARCHITECT:

ATELIER

ATELIER 424
1575 TREAT BLVD. STE 101
WALNUT CREEK CA 94598

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ARCHITECTURE . INTERIORS . PLANNING

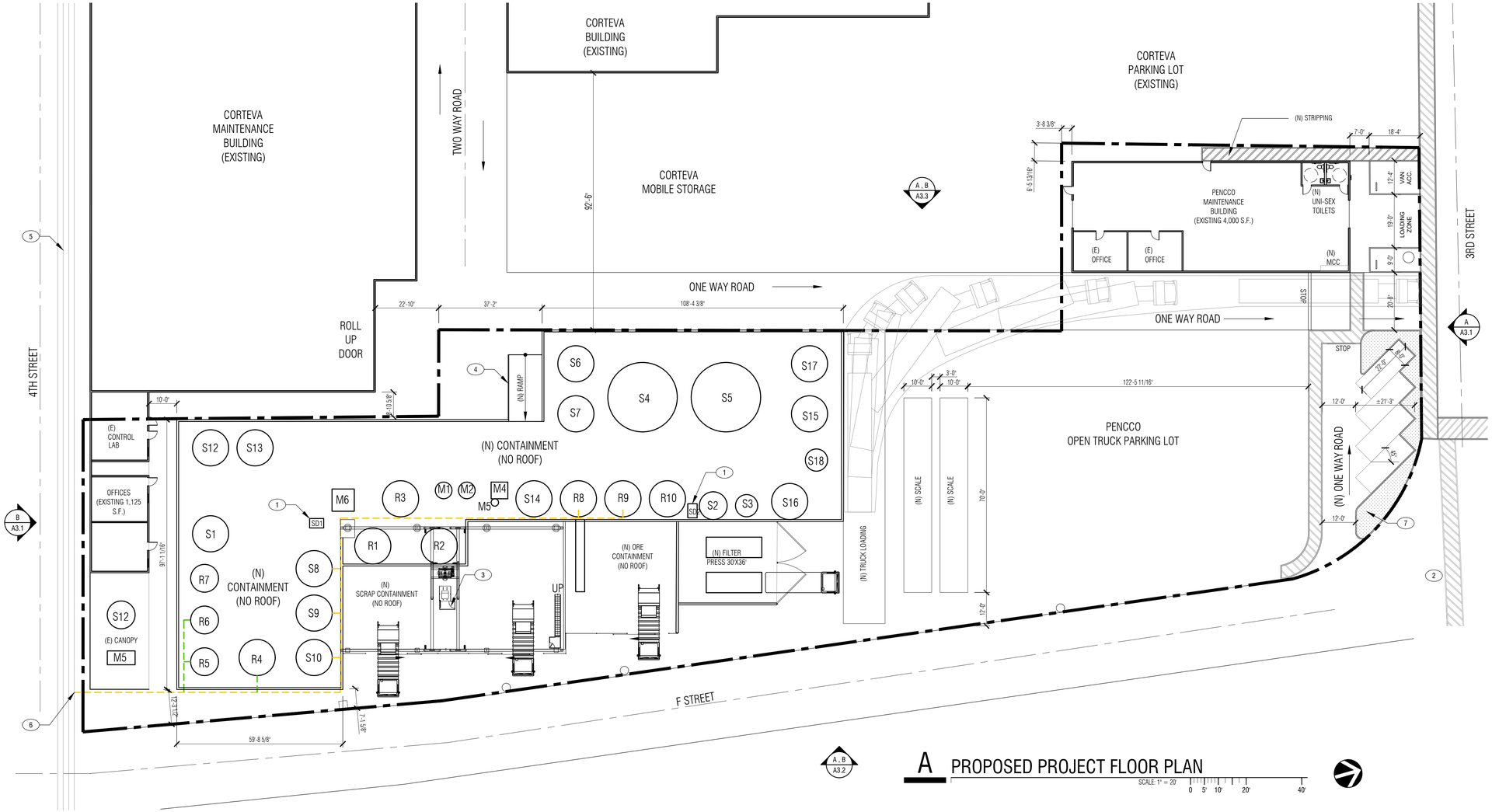
LICENSED ARCHITECT
BYRIF RATANA
No. C-25912
Ren. 04-30-2025
STATE OF CALIFORNIA

SHEET TITLE:

PROJECT MASTER PLAN

SHEET NO:

A1.4



A PROPOSED PROJECT FLOOR PLAN

SCALE: 1" = 20'

0 5' 10' 20' 40'

SHEET KEY NOTES:

1. SUMP PUMP DRAIN
2. EXISTING PEDESTRIAN STRIPPING
3. OVERHEAD CRANE
4. 42' PIPE GURDRAIL
5. EXISTING OVERHEAD PIPE RACK
6. NEW 6" C12 AND HCL POINT OF CONNECTION
7. LANDSCAPE

SHEET NOTES:

1. EXISTING SITE AND EXISTING BUILDINGS INFORMATION HAVE BEEN PROVIDED BY THE OWNER. THE ARCHITECT (ATELIER 424) DOES NOT BEAR ANY RESPONSIBILITY FOR THE ACCURACY OF THE INFORMATION PROVIDED .
2. USE CIVIL DRAWINGS FOR ANY NEW SITE WORK, INCLUDING GRADING, EROSION CONTROL AND SITE DRAINAGE.

SHEET LEGEND:

- CHLORINE GAS PIPELINE
- HYDROCHLORIC ACID PIPELINE

KEY-NO	TAG-NO	CATEGORY-DESCRIPTION	TANK DIMENSIONS			
			WIDTH	LENGTH	DIAMETER	HEIGHT
REACTORS :						
R1	RT-501	IRON REACTOR	-	-	13'-0"	16'-0"
R2	RT-502	IRON REACTOR	-	-	13'-0"	16'-0"
R3	RT-503	OVERFLOW REACTOR	-	-	13'-0"	16'-0"
R4	RT-504	FERROUS CHLORIDE	-	-	13'-0"	16'-0"
R5	RT-512	1ST STAGE CHLORINATOR	-	-	10'-0"	20'-0"
R6	RT-513	2ND STAGE CHLORINATOR	-	-	10'-0"	20'-0"
R7	RT-514	FERROUS CHLORIDE TRANSFER	-	-	10'-0"	20'-0"
R8	RT-571	ORE DIGESTER	-	-	13'-0"	20'-0"
R9	RT-572	ORE DIGESTER	-	-	13'-0"	20'-0"
R10	RT-583	FERRIC SULFATE DIGESTER	-	-	13'-0"	20'-0"
STORAGE TANKS :						
S1	T-511	FERRIC CHLORIDE FEED TANK	-	-	13'-0"	30'-0"
S2	T-515	NaOH 25%	-	-	10'-0"	-
S3	T-516	FILTER TREATMENT	-	-	8'-0"	-
S4	T-521	FERROUS CHLORIDE STORAGE	-	-	25'-0"	25'-0"
S5	T-522	FERROUS CHLORIDE STORAGE	-	-	25'-0"	25'-0"
S6	T-531	FERROUS CHLORIDE	-	-	13'-0"	30'-0"
S7	T-532	FERROUS CHLORIDE	-	-	13'-0"	30'-0"
S8	T-541	36% HCl	-	-	13'-0"	30'-0"
S9	T-542	36% HCl	-	-	13'-0"	30'-0"
S10	T-543	15-30% HCl	-	-	13'-0"	30'-0"
S11	T-560	PROCESS WATER	-	-	13'-0"	-
S12	T-561	PROCESS WATER	-	-	-	-
S13	T-562	PROCESS WATER	-	-	-	-
S14	T-563	SCRUBBER WATER	-	-	-	-
S15	T-581	SULFURIC ACID	-	-	13'-0"	24'-0"
S16	T-582	FERRIC SULFATE OXIDIZER	-	-	13'-0"	-
S17	T-584	FERRIC SULFATE	-	-	13'-0"	-
S18	T-590	LIQUID OXYGEN	-	-	8'-0"	-
MISCELANOUS TANKS :						
M1	WS-509	CAUSTIC 3%	-	-	6'-0"	-
M2	CS-510	SCRUBBER STACK	-	-	6'-0"	-
M3	F-510	SCRUBBER FAN	6'-0"	6'-0"	-	-
M4	S-510	SCRUBBER STACK	-	-	-	-
EQUIPMENTS :						
M5	AC-130	LIQUID OXYGEN	-	-	-	-
M6	CT-500	COOLING WATER	5'-0"	5'-0"	-	-
SD1	-	SUMP PUMP	3'-0"	5'-0"	-	-
SD2	-	SUMP PUMP	3'-0"	5'-0"	-	-

PROJECT INFO:

REVISIONS:

1	CLIENT REVIEW	10 . 16 . 2023
2	PLANNING REVIEW SUBMITTAL	11 . 16 . 2023
3	PLANNING REVIEW SUBMITTAL - R1	01. 10 . 2024

PROJECT NO:	700-2206-02
REVIEWED BY:	SR
DATE/TIME STAMP:	11 . 13 . 2023
SCALE:	AS NOTED
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Water Treatment Products Manufacturing Facility
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ARCHITECT:

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ARCHITECTURE . INTERIORS . PLANNING

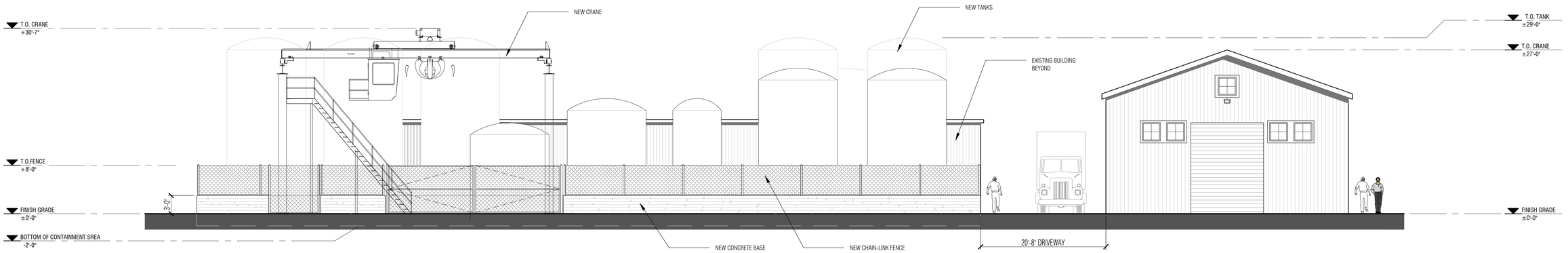
LICENSED ARCHITECT — FARIF RAHIM — No. C-25912 — Exp. 04-30-2025 — STATE OF CALIFORNIA

SHEET TITLE:

OVERALL FLOOR PLAN

SHEET NO:

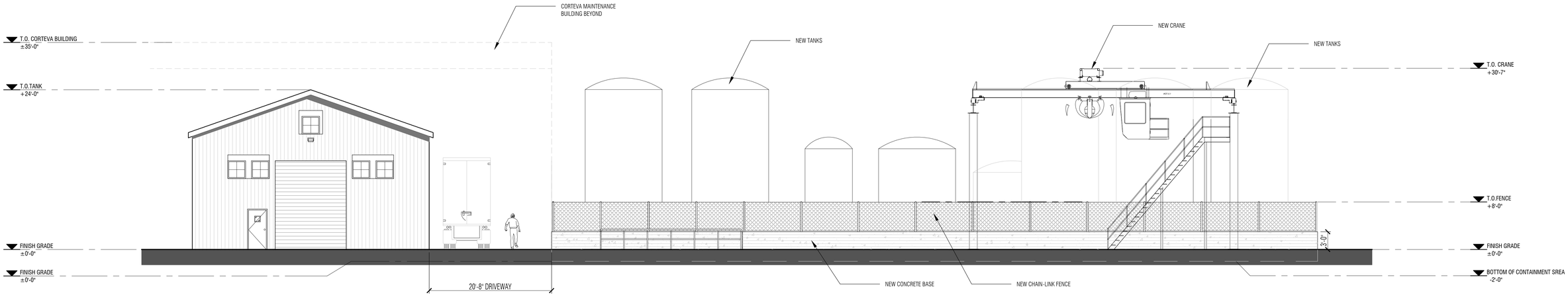
A2.1



A NORTH ELEVATION

SCALE: 1/8" = 1' - 0"

0 2' 4' 8' 16'



B SOUTH ELEVATION

SCALE: 1/8" = 1' - 0"

0 2' 4' 8' 16'

PROJECT INFO

REVISIONS:

1	CLIENT REVIEW	10 . 16 . 2023
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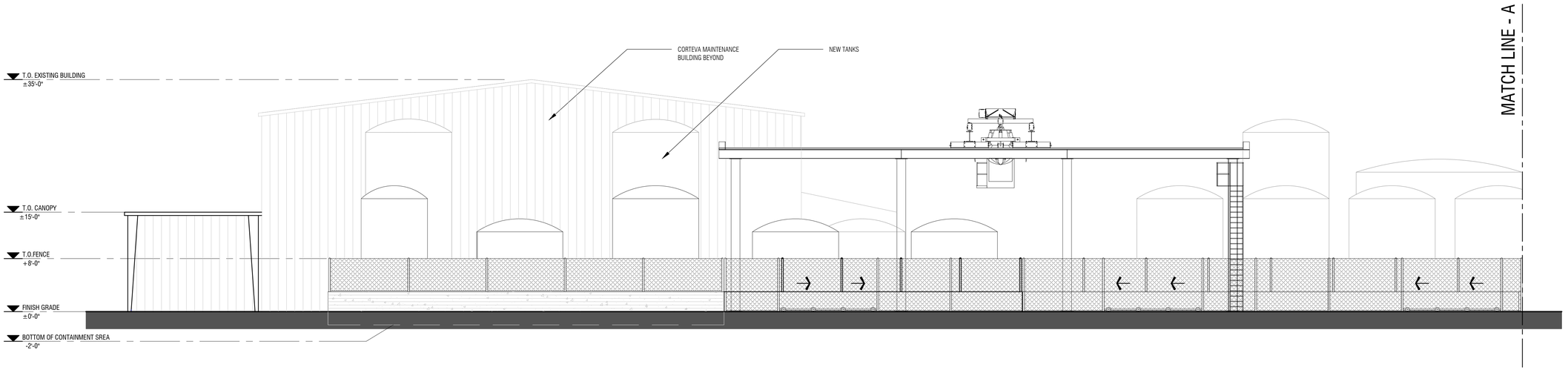
LICENSED ARCHITECT
SPIRIT RATNAM
No. C-25912
Ren. 04-30-2025
STATE OF CALIFORNIA

SHEET TITLE:

EXTERIOR ELEVATIONS

SHEET NO:

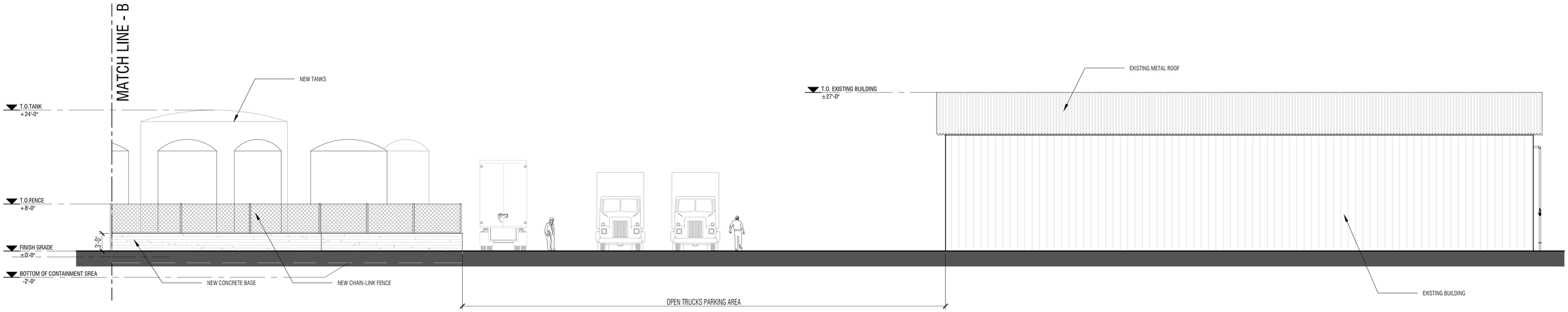
A3.1



A PARTIAL EAST ELEVATION

SCALE: 1/8" = 1' - 0"

0 2' 4' 8' 16'



B PARTIAL EAST ELEVATION

SCALE: 1/8" = 1' - 0"

0 2' 4' 8' 16'

PROJECT INFO

REVISIONS:		
1	CLIENT REVIEW	10 . 16 . 2023
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DATE/TIME STAMP	11 . 13 . 2023
SCALE:	AS NOTED
ISSUED:	PLANNING REVIEW

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CLIENT

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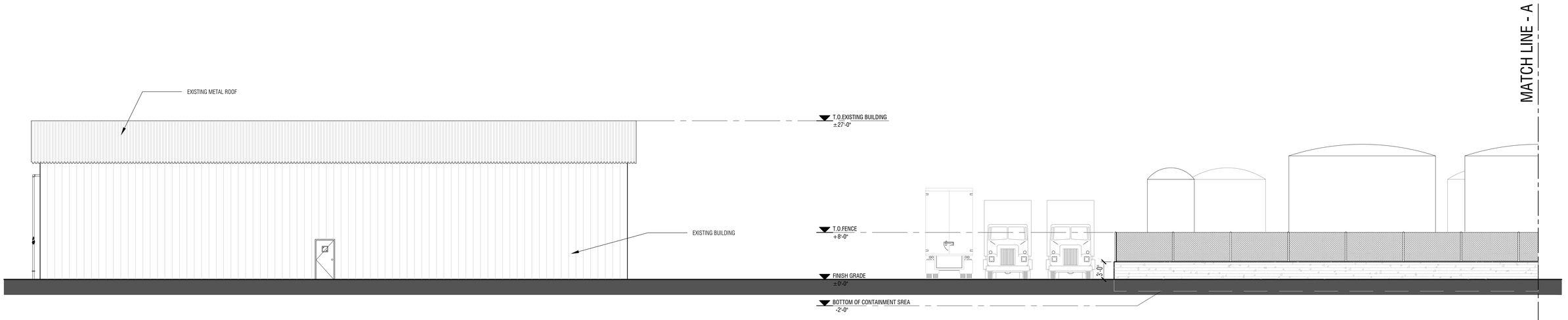
LICENSED ARCHITECT — SYRIT F. RATNER — No. C-25912 — Exp. 04-30-2025 — STATE OF CALIFORNIA

SHEET TITLE

EXTERIOR ELEVATIONS
MONUMENT MAP

SHEET NO.

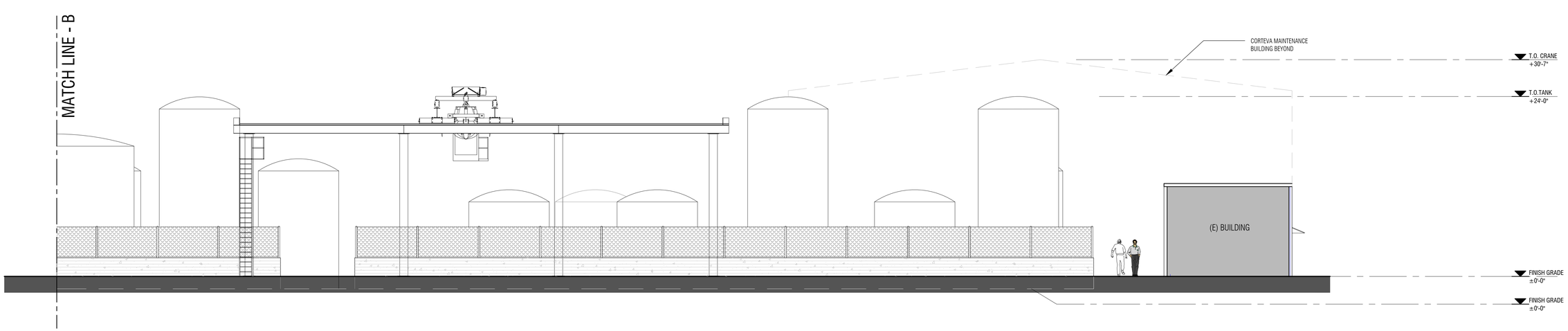
A3.2



A PARTIAL WEST ELEVATION

SCALE: 1/8" = 1' - 0"

0 2' 4' 8' 16'



B PARTIAL WEST ELEVATION

SCALE: 1/8" = 1' - 0"

0 2' 4' 8' 16'

PROJECT INFO

REVISIONS:		
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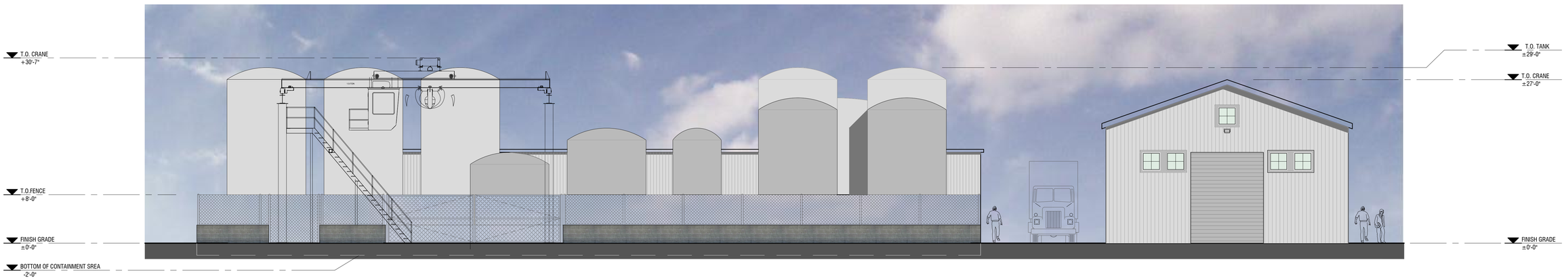
LICENSED ARCHITECT
SYRIT RATNAM
No. C-25912
Exp. 04-30-2025
STATE OF CALIFORNIA

SHEET TITLE:

EXTERIOR ELEVATIONS

SHEET NO:

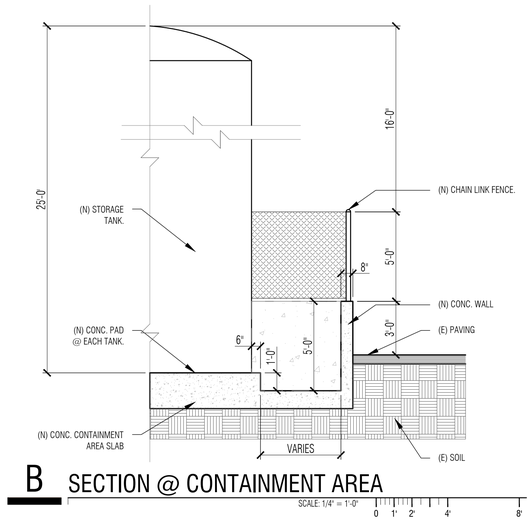
A3.3



A NORTH ELEVATION

SCALE: 1/8" = 1' - 0"

0 2' 4' 8' 16'



B SECTION @ CONTAINMENT AREA

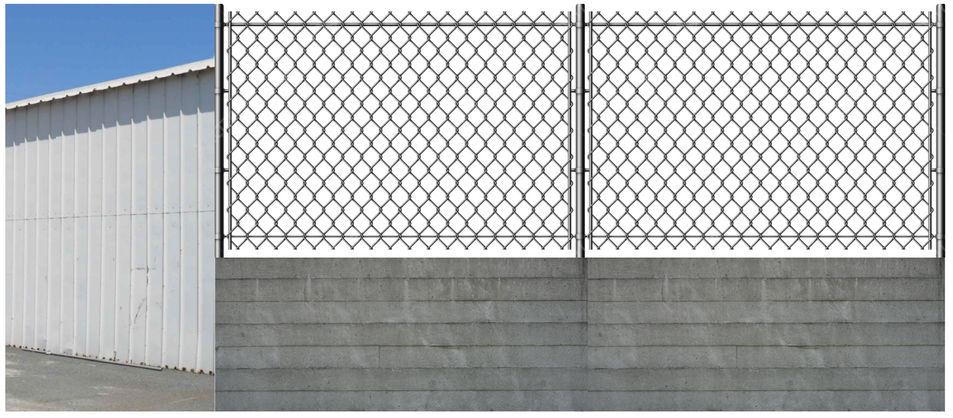
SCALE: 1/4" = 1'-0"

0 1' 2' 4' 8'

MATERIAL LEGEND:

1. NEW CHAIN-LINK FENCE - BLACK COLOR
2. NEW CONCRETE BASE
3. EXISTING BUILDING

3



1

2

C COLOR AND MATERIALS

REVISIONS:		
1	CLIENT REVIEW	10 . 16 . 2023
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3	PLANNING REVIEW SUBMITTAL - R1	01. 10 . 2024

PROJECT INFO:

PROJECT NO:	700-2206-02
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ARCHITECT:

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ARCHITECTURE . INTERIORS . PLANNING

LICENSED ARCHITECT — JEFFREY RANTSCH — No. C-25912 — Renewal. 04-30-2025 — STATE OF CALIFORNIA

SHEET TITLE:

EXTERIOR COLOR ELEVATION
MATERIAL COLOR BOARD

SHEET NO:

A3.4

Attachment 6
Development Review Design Guidelines
Pencco Iron Salts Manufacturing Project, AP-23-0167 (UP, DR)

Design Review Guideline	Meets Guideline?
IV.a: Parking areas should be screened from view from any public right-of-way (beaming or hedge-type plant material). Parking areas should be broken up (landscape islands, projections, etc.) to eliminate vast areas of parking especially along street frontages.	**Not applicable.** The proposed project does not involve any new paving for parking. Some landscaping strips will be added to portions of the site. Parking areas are within existing paved areas of the Corteva industrial campus and will remain mostly unchanged.
IV.b: Provisions should be made for permanent shopping cart corrals in retail shopping centers.	**Not applicable.** This guideline is intended to apply to retail shopping centers and not industrial plants.
IV.c: Existing trees on site should be incorporated into the project site design, unless waived by the City Planner or Planning Commission.	**Not applicable.** The existing industrial site has little or no vegetation.
IV.d: Developer should elect, at least, one of the schemes provided in Appendix #1 for screening all utility box transformers, backflow preventers, meters and junction boxes.	**Conditionally.** A COA has been added to require screening to minimize visual impacts on adjacent properties.
IV.e: Projects with many buildings (greater than three) should have a variety of building sizes and masses.	**Not applicable.** There are no new occupied buildings proposed as part of the proposed plant installation.
IV.f: Continuous horizontal roof lines should be broken up whenever possible. An expanse should not exceed 50 (fifty) feet in length unless architecture or size dictate a greater expanse.	**Not applicable.** There are no new occupied buildings proposed as part of proposed plant installation.
IV.g: Building entries should be designed as a focal point. They should be designed to set the theme or be the primary feature of the building or commercial center.	**Not applicable.** This item is meant to apply to new permanent buildings on a foundation, the proposed new structures are storage tanks and other plant equipment, and therefore not applicable.

IV.h: Building elevations (example: rear of shopping centers) visible from public right-of-ways should be addressed in design review and treated appropriately.	**Not applicable.** This item is meant to apply to new permanent buildings on a foundation, the proposed new structures are storage tanks and plant equipment, and therefore not applicable.
IV.i: A free-standing structure within an existing commercial or industrial center should be architecturally compatible with the center, including but not limited to materials, colors and architectural elements.	**Consistent.** The proposed structures are plant equipment and are in-keeping with the character of the other existing plant installations at the Corteva campus and the surrounding industrial area.
IV.j: All roof mounted equipment should be screened completely from view from all public right-of-ways. A site-line study may be necessary to determine appropriate screening method.	**Not applicable.** The proposed structures are not roof-mounted, and therefore criterion not applicable.
IV.k: All Structures, including, but not limited to, “tilt-up” type structures, should have structural reliefs and articulated entries (Encourage the creation of shadow lines).	**Not applicable.** This item is meant to apply to permanent buildings on a foundation, the proposed structures are manufacturing plant equipment, and therefore not applicable.
IV.l: Exterior fire escapes, stairs and other appurtenances should be designed or treated as integral parts of the building façade.	**Not applicable.** This item is meant to apply to permanent buildings on a foundation, the proposed structures are manufacturing plant equipment that would be required to meet industry fire prevention standards, and therefore not applicable.
IV.m: Downspouts should be designed into the façade of the building unless architecturally treated.	NA.
IV.n: Add murals, lattice or some other spaceframe type treatment to blank walls visible from public view.	**Not applicable.** This item is meant to apply to ne permanent buildings on a foundation, the proposed structures are manufacturing plant equipment, and therefore not applicable.
IV.o: Prototype or “theme” architecture is discouraged.	**Not applicable.** No themed architecture is proposed.
IV.p: New or remodeled buildings should be designed to be compatible in design, color and materials with adjacent development.	**Not applicable.**

IV.q: The street-oriented elevations shall be designed so as not to present the appearance of a rear elevation (i.e., no loading doors or large blank walls, absence of architectural features found on other elevations, and limited landscaping as typically found on interior property lines).	**Not applicable.**
IV.r: Trash enclosures should include area for collection of recyclables (example: space for two 90-gallon containers minimum, See Appendix #2 Trash Enclosure Design Standards).	**Not applicable.** No trash enclosures are proposed with this project.
Green Building Design Guideline	**Meets Guideline?**
VI.D.1: Roofs should be designed to integrate renewable energy generation systems and provide a cool urban environment.	**Not applicable.**
VI.D.2: Parking lot impacts should be minimized.	**Not applicable.** The proposed project does not increase the existing paved parking areas. Some landscaping is proposed to soften portions of the parking areas.
VI.D.3: Hardscapes should be constructed with permeable surfaces (e.g. pervious concrete, porous asphalt, unit pavers, and granular materials). Permeable paving consisting of porous above-ground materials, a 6- inch porous sub-base, and a base layer that is designed to ensure proper drainage away from the building and neighboring properties. Alternatively, impermeable surfaces may be used if they direct all runoff toward an appropriate permanent infiltration feature (e.g. vegetated swale, on-site rain garden, or rainwater cistern).	**Conditionally Consistent.** A proposed condition of approval requires the applicant to comply with all the requirements of the Community Development Department. The Engineering Division of the Community Development Department will provide regulations for any proposed new hardscaping once the applicant submits grading and improvement plans for the project.
VI.D.4: Design choices should incorporate or prepare for electric vehicle charging or used vegetable oil fueling infrastructure.	COA will require EV charging stations if required by code.

VI.D.5: Fuel cell technology should be considered for application where (1) space or cost prohibits non-emitting on-site generation (such as solar, wind or geothermal), AND either (2) the heat resulting from fuel combustion is utilized for water or space heating, and/or (3) the fuel cells would be used primarily during peak utility hours.	**Not applicable.**
VI.D.6: Reclaimed (purple pipeline) water should be used for as much non-potable water uses as feasible and practical. Landscaping water fixtures using reclaimed water should be purple, and purple and white signage should clearly mark areas that are irrigated with reclaimed water.	**Not applicable.**.
VI.D.7: Large commercial and institutional facilities that are anticipated to employ more than 50 employees, should consider providing on-site shops and services for those employees.	**Not applicable.** The proposed project will not require 50 additional employees.
VI.D.8: Street side building faces should encourage walking.	**Not applicable.**
VI.D.9: Secure bicycle parking facilities should be provided for at least 10% of expected peak hour trips. Bicycle parking structures should complementary to the surrounding structures and may be partially obscured by vegetation or painted with a mural design that is consistent with surrounding aesthetics. Shade trees should be planted if the parking facility is located in an area not shaded by surrounding structures. They should be located in an accessible and visible space to discourage misuse.	**Not Applicable.** Only one bicycle parking space/rack is required**.**

Attachment 5
Property Development Regulations Table
Pencco Iron Salts Manufacturing Project, AP-23-0167 (UP, DR)

Development Regulations: *Service Commercial District (CS) District*	**Required:**	**Proposed:**
Minimum lot area (ac.)	20,000 SF	N/A (1.38 Acre portion of existing Corteva Campus)
Minimum lot width (ft)	100 ft	105+ ft (existing)
Max. Lot Coverage:	75%	47% (28K/60K)
Minimum Yards:	-	-
Front:	25 ft	200+ feet
Side:	-	Approximately 8 ft. (proposed equipment location)
Rear:	-	Approximately 215 ft. (proposed equipment location)
Maximum height of structures (ft):	50ft	30'-7"
Maximum FAR	0.8	N/A (Existing buildings)
Minimum site landscaping	10%	COA Added

Attachment - 6
Aerial View and Map of Surrounding Uses




New York Slough
Pittsburg Point
k2 Pure Solutions
Pittsburg Waterfront Rd
Loveridge Rd
E 3rd St
Project Site
Univar Solutions
Corteva Agriscience
Pittsburg Waterfront Rd
PSC Reduction Technologies
Pittsburg Waterfront Rd

City of Pittsburg
California

65 Civic Avenue
Pittsburg, CA 94565
P: (925) 252-6900
F: (925) 252-4814
pittsburgca.gov

Community and Economic Development Department – Planning Division

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the **PLANNING COMMISSION** of the City of Pittsburg will conduct a public hearing on:

DATE: **July 22, 2025**
TIME: **7:00 p.m.**
PLACE: **City Council Chamber at City Hall**
65 Civic Avenue, Pittsburg, California

Concerning the following matter:

Pencco Iron Salts Manufacturing Plant, AP-23-0167 (UP, DR)
Use Permit and Design Review application for the construction and operation of an iron salts (for water treatment and purification) manufacturing plant facility at the Corteva industrial complex located at 901 Loveridge Road, Pittsburg, California 94565. The subject parcel is zoned General Industrial (IG) and is designated Industrial in the City of Pittsburg 2040 General Plan. Assessor's Parcel Number: 073-220-049.

Environmental Determination
On January 22, 2025, Staff circulated the project Mitigated Negative Declaration (MND) for a 30-day public review and comment.

PROJECT PLANNER: Maurice Brenyah-Addow, (925) 252-4261 or mbrenyah-addow@pittsburgca.gov

Why am I receiving this notice?
You are receiving this notice because you have either previously requested notifications from the Planning Division, or a project has been proposed in your neighborhood and all property owners within a minimum 300-foot radius of the project site are required to be notified under the Pittsburg Municipal Code.

Where can I get more information about this project?
The complete file for this project is available for public inspection; please contact the project planner listed above to make necessary arrangements.

What can I do if I have comments on the project?
Comments or objections to the project can be made by writing or through e-mailed testimony prior to the meeting or provided orally during the meeting. Written comments citing the project name may be emailed to the project planner listed above or may be mailed or delivered to Pittsburg Planning Division, 65 Civic Avenue, Pittsburg, CA 94565.

Pursuant to Section 65009 of the California Government Code, if you challenge this matter in court, you may be limited to those issues you or someone else raised at the public hearing described in this notice, or in written correspondence on the matter delivered to this agency at, or prior to the public hearing. Any written correspondence delivered to the Planning Division before the hearing body's action on the matter will become a part of the administrative record.

Para información en español:
(925) 252-4920

JOHN FUNDERBURG, SECRETARY
PITTSBURG PLANNING COMMISSION

Project Title: Pencco Iron Salts Manufacturing Plant, AP-23-0167 (UP, DR)
Location: 901 Loveridge Road, APN 073-220-049



City of Pittsburg
Community Development Department - Planning Division
65 Civic Avenue
Pittsburg, CA 94565

NOTICE OF PUBLIC HEARING

CITY OF PITTSBURG
PLANNING COMMISSION
STAFF REPORT
July 22, 2025

ITEM: Notice of Intent to Exercise Delegated Design Review Authority

ORIGINATED BY: City of Pittsburg, Zoning Administrator, 65 Civic Avenue, Pittsburg, CA 94565

SUBJECT: The Zoning Administrator submits one notice of intent to exercise delegated design review authority for:

1) An application filed by Steve Proo, on behalf of AT&T, requesting Administrative Design Review and Minor Modification approval to install new equipment for a wireless facility (collocation) on an existing 94' PG&E lattice tower located at 107 Greenmeadow Circle, Assessor's Parcel No. 093-320-068.

RECOMMENDATION:

Staff recommends that the Planning Commission acknowledge receipt of the attached Notice of Intent to Exercise Delegated Design Review Authority.

BACKGROUND:

Delegated Design Review Authority: Planning Commission Resolution No. 9444, as later amended by Resolution No. 9918, allows for delegation of nine categories of design review applications from the Planning Commission to the Zoning Administrator, as follows:

1. Freestanding signs: Applicable to signs not already part of a sign program; must be consistent with sign standards and architecturally compatible with associated building.

2. Wireless Communication Equipment: New or replacement antennas on existing poles and their related equipment.

3. Minor Building Remodels: Limited to changes in building colors, awnings, fenestration, and finishes.

4. Changes to Existing Parking Lots.

5. Changes to Existing Landscaping.

6. Additions to Existing Buildings: Additions must be smaller than 2,500 square feet and designed to complement existing building architecture.

7. New Model Homes in Approved Subdivisions. Must be consistent with the general size, quality of architecture and materials, and general character of the

originally approved models. Must comply with approved zoning development standards.

8. Ancillary Structures: Structures in any district where visual impacts are minimal, including miscellaneous mechanical equipment associated with legal uses in the Industrial Districts.

The intent of the delegation is to allow a more efficient approval process for non-controversial design review applications, without compromising the integrity of the design review process or removing from public scrutiny those projects that would be most visible or of high interest to the general public. Prior to approving any delegated design review application, the Zoning Administrator must notify the Commission of his or their intent to exercise delegated design review authority. Copies of resolutions approving any delegated design review application must also be provided to the Commission.

PROJECT DESCRIPTIONS:

1. **AT&T Equipment Enclosure and Addition of Wireless Communication Equipment to Existing 94' PG&E Tower, AP-25-0023 (ADR and MM).**

This is an application filed by Steve Proo, on behalf of AT&T, requesting Administrative Design Review and Minor Modification approval to install new equipment for a wireless facility (collocation) on an existing 94' PG&E lattice tower located at 107 Greenmeadow Circle, Assessor's Parcel No. 093-320-068.

The proposed project includes the installation of nine antennas at heights ranging from 34 to 47 feet, and the construction of a 247 square foot equipment enclosure. The proposed equipment enclosure will be constructed using brown fiberglass material to match existing adjacent enclosure on site. There is no landscaping or antenna camouflaging proposed as part of this application. The parcel is located in the Oak Hills Planned Development area, "PD-1204," within the "Open Space" General Plan district.

This project is delegated to staff under Category 2 (Wireless Communication Equipment), pursuant to Planning Commission Resolution No. 9918. Projects eligible for delegation under this category are limited to new or replacement antennas on existing poles and their related equipment.

GENERAL PLAN/CODE COMPLIANCE:

Delegated Design Review Authority: Resolution No. 9918 established nine categories of design review applications upon which the Commission would authorize the Zoning Administrator to act. Resolution No. 9918, and PMC section 18.10.100, direct staff to notify the Planning Commission of intent to exercise delegated design review authority on any application that falls within one of those nine categories, prior to approving the application. Upon receiving such notification, a majority of the Commission may direct that the matter be scheduled for future consideration by the entire Commission. Resolution No. 9918 also directs staff to keep the Commission informed about

delegated design review application approvals by providing copies of resolutions adopted by the Zoning Administrator.

ANALYSIS:

Not applicable.

ACTION REQUIRED:

Acknowledge receipt of the attached Notice of Intent.

ATTACHMENTS:

1. NOI - AT&T Equipment Enclosure and Addition of Wireless Communication Equipment to Existing 94' PG&E Tower, AP-25-0023 (ADR and MM)
2. PC Resolution No. 9918

Prepared by: John Funderburg, Zoning Administrator

NOTICE OF INTENT

TO EXERCISE DESIGN REVIEW AUTHORITY DELEGATED TO STAFF PURSUANT TO PLANNING COMMISSION RESOLUTION NO. 9918

AT&T Equipment Enclosure and Addition of Wireless Communication Equipment to Existing 94' PG&E Tower, AP-25-0023 (ADR and MM).

This is an application filed by Steve Proo, on behalf of AT&T, requesting Administrative Design Review and Minor Modification approval to install new equipment for a wireless facility (collocation) on an existing 94' PG&E lattice tower located at 107 Greenmeadow Circle, Assessor's Parcel No. 093-320-068. The proposed project includes the installation of nine antennas at heights ranging from 34 to 47 feet, and the construction of a 247 square foot equipment enclosure. The proposed equipment enclosure will be constructed using brown fiberglass material to match existing adjacent enclosure on site. There is no landscaping or antenna camouflaging proposed as part of this application. The parcel is located in the Oak Hills Planned Development area, "PD-1204," within the "Open Space" General Plan district.

This project is delegated to staff under Category 2 (Wireless Communication Equipment), pursuant to Planning Commission Resolution No. 9918. Projects eligible for delegation under this category are limited to new or replacement antennas on existing poles and their related equipment.

Exhibit A

AT&T SITE NUMBER: CCL05107
AT&T SITE NAME: OAK HILLS

PROJECT / INITIATIVE: NSB
USID: 330424
FA CODE: 15521691
WOID: RFDS-7837
RFDS DATE: 10/14/24
JOB ID: WSSFR0017185
PTN: 3701A0YBSJ

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565
JURISDICTION: CITY OF PITTSBURG
APN: 093-320-068-5

SITE TYPE: OUTDOOR EQUIPMENT / PG&E LATTICE TOWER

PG&E INFORMATION

TOWER INFO:

TOWER SAP#:	40581785
TOWER#:	6/30
LINE NAME:	TBD

PG&E CONTACT INFO:

PROJECT MANAGER:	STEVEN MILLIKEN (925) 222-0536 S6MA@PGE.COM
ADDRESS:	245 MARKET STREET, MAIL CODE N10D SAN FRANCISCO, CA 94105

PROJECT DESCRIPTION

A (N) AT&T UNMANNED TELECOMMUNICATION FACILITY CONSISTING OF:

- (N) LEASE AREAS W/ (N) GROUND MOUNTED EQUIPMENT CABINETS & (N) UTILITIES TO (N) SITE LOCATION.
- (N) ANTENNAS & ANTENNA EQUIPMENT ON (E) PG&E LATTICE TOWER

PROJECT INFORMATION

SITE NAME:	OAK HILLS
SITE #:	CCL05107
COUNTY:	CONTRA COSTA
JURISDICTION:	CITY OF PITTSBURG
APN:	093-320-068-5
SITE ADDRESS:	107 GREENMEADOW CIRCLE PITTSBURG, CA 94565
CURRENT ZONING:	(PD) PLANNED DEVELOPMENT
CONSTRUCTION TYPE:	V-B
OCCUPANCY TYPE:	U, (UNMANNED COMMUNICATIONS FACILITY)
POWER:	PG&E
LATITUDE:	N 38° 00' 49.45" NAD 83 N 38.013735° NAD 83
LONGITUDE:	W 121° 57' 16.98" NAD 83 W 121.954716° NAD 83
GROUND ELEVATION:	318.5' AMSL
PROPERTY OWNER:	WEST COAST HOME BUILDERS, INC. 4021 PORT CHICAGO HIGHWAY CONCORD, CA 94520
TOWER OWNER:	PACIFIC GAS & ELECTRIC COMPANY 245 MARKET STREET MAIL CODE N10D ATTN: STEVEN MILLIKEN (925) 222-0536 S6MA@PGE.COM
APPLICANT:	AT&T MOBILITY 5005 EXECUTIVE PARKWAY SAN RAMON, CA 94583
SITE ACQUISITION COMPANY:	COMPLETE WIRELESS CONSULTING 2009 V STREET SACRAMENTO, CA 95818
LEASING CONTACT:	ATTN: ROCKY CORDOVA (916) 616-0468 RCORDOVA@COMPLETEWIRELESS.NET
ZONING CONTACT:	ATTN: STEVE PROO (916) 838-6713 SPROO@COMPLETEWIRELESS.NET
CIVIL VENDOR:	JACOBS ATTN: TIM LENCIONI (916) 437-9119 TIMOTHY.LENCIONI@US.AMENTUM.COM

VICINITY MAP



DRIVING DIRECTIONS

FROM: 5005 EXECUTIVE PARKWAY, SAN RAMON, CA 94583
TO: 107 GREENMEADOW CIRCLE, PITTSBURG, CA 94565

1.	GET ON I-680 N IN DANVILLE FROM CAMINO RAMON	
2.	HEAD WEST	85 FT
3.	TURN RIGHT	0.1 MI
4.	TURN RIGHT TOWARD EXECUTIVE PKWY	292 FT
5.	TURN RIGHT ONTO EXECUTIVE PKWY	0.2 MI
6.	TURN LEFT ONTO CAMINO RAMON	0.8 MI
7.	USE THE LEFT 2 LANES TO TURN LEFT ONTO CROW CANYON RD	0.3 MI
8.	USE THE RIGHT 2 LANES TO TURN RIGHT TO MERGE ONTO I-680 N TOWARD SACRAMENTO	0.4 MI
9.	MERGE ONTO I-680 N	14.1 MI
10.	KEEP RIGHT AT THE FORK TO CONTINUE ON CA-242 N, FOLLOW SIGNS FOR CONCORD/PITTSBURG/STATE ROUTE 242	3.2 MI
11.	USE THE LEFT 3 LANES TO MERGE ONTO CA-4 E TOWARD STOCKTON/PITTSBURG	4.2 MI
12.	TAKE EXIT 19 FOR SAN MARCO BLVD/WILLOW PASS RD TOWARD BAY POINT	0.3 MI
13.	TURN RIGHT ONTO SAN MARCO BLVD	0.2 MI
14.	USE THE LEFT 2 LANES TO TURN LEFT ONTO W LELAND RD	0.8 MI
15.	TURN RIGHT ONTO WOODHILL DR	0.3 MI
16.	TURN RIGHT ONTO GREENMEADOW CIR	
17.	DESTINATION WILL BE ON THE RIGHT	

END AT: 107 GREENMEADOW CIRCLE, PITTSBURG, CA 94565

ESTIMATED TIME: 29 MINUTES ESTIMATED DISTANCE: 24.9 MILES

CODE COMPLIANCE

ALL WORK & MATERIALS SHALL BE PERFORMED & INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUED TO PERMIT WORK NOT CONFORMING TO THESE CODES:

2022 CALIFORNIA ADMINISTRATIVE CODE, PART 1, TITLE 24 C.C.R.
2022 CALIFORNIA BUILDING CODE (CBC), PART 2, VOLUME 1&2, TITLE 24 C.C.R.
(2021 INTERNATIONAL BUILDING CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA ELECTRICAL CODE (CEC), PART 3, TITLE 24 C.C.R.
(2020 NATIONAL ELECTRICAL CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA MECHANICAL CODE (CMC) PART 4, TITLE 24 C.C.R.
(2021 UNIFORM MECHANICAL CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA PLUMBING CODE (CPC), PART 5, TITLE 24 C.C.R.
(2021 UNIFORM PLUMBING CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA ENERGY CODE (CEC), PART 6, TITLE 24 C.C.R.
2022 CALIFORNIA FIRE CODE, PART 9, TITLE 24 C.C.R.
(2021 INTERNATIONAL FIRE CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA GREEN BUILDING STANDARDS CODE, PART 11, TITLE 24 C.C.R.
2022 CALIFORNIA REFERENCED STANDARDS, PART 12, TITLE 24 C.C.R.
ANSI/EIA-TIA-222-H

ALONG WITH ANY OTHER APPLICABLE LOCAL & STATE LAWS AND REGULATIONS

DISABLED ACCESS REQUIREMENTS

THIS FACILITY IS UNMANNED & NOT FOR HUMAN HABITATION. DISABLED ACCESS & REQUIREMENTS ARE NOT REQUIRED IN ACCORDANCE WITH CALIFORNIA STATE BUILDING CODE, TITLE 24 PART 2, SECTION 11B-203.5

SHEET INDEX

SHEET	DESCRIPTION	REV
T-1.1	TITLE SHEET	-
C-1	TOPOGRAPHIC SURVEY	-
A-1.1	OVERALL SITE PLAN	-
A-1.2	ENLARGED SITE PLAN	-
A-1.3	EQUIPMENT PLAN	-
A-2.1	ANTENNA PLAN	-
A-3.1	(E) ELEVATIONS	-
A-3.2	(N) ELEVATIONS	-
A-4.1	ANTENNA DETAILS	-
A-4.2	EQUIPMENT DETAILS	-
E-1.1	ELECTRICAL PLAN	-

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t
5005 Executive Parkway
San Ramon, California 94583

Vendor:

COMPLETE Wireless Consulting, Inc.

AT&T SITE NO:	CCL05107
PROJECT NO:	N/A
DRAWN BY:	T.T.
CHECKED BY:	J. GRAY
APPROVED BY:	-

ISSUE STATUS

REV	DATE	DESCRIPTION	CAD
2	03/11/25	CLIENT REV	T.T.
1	01/23/25	ZD 100%	T.T.
0	08/30/24	ZD 90%	T.T.

Licensee:

PRELIMINARY: NOT FOR CONSTRUCTION

KEVIN R. SORENSEN
S4469

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ENGINEER:

Streamline Engineering and Design, Inc.
3843 Taylor Road, Suite A, Loomis, CA 95650
Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

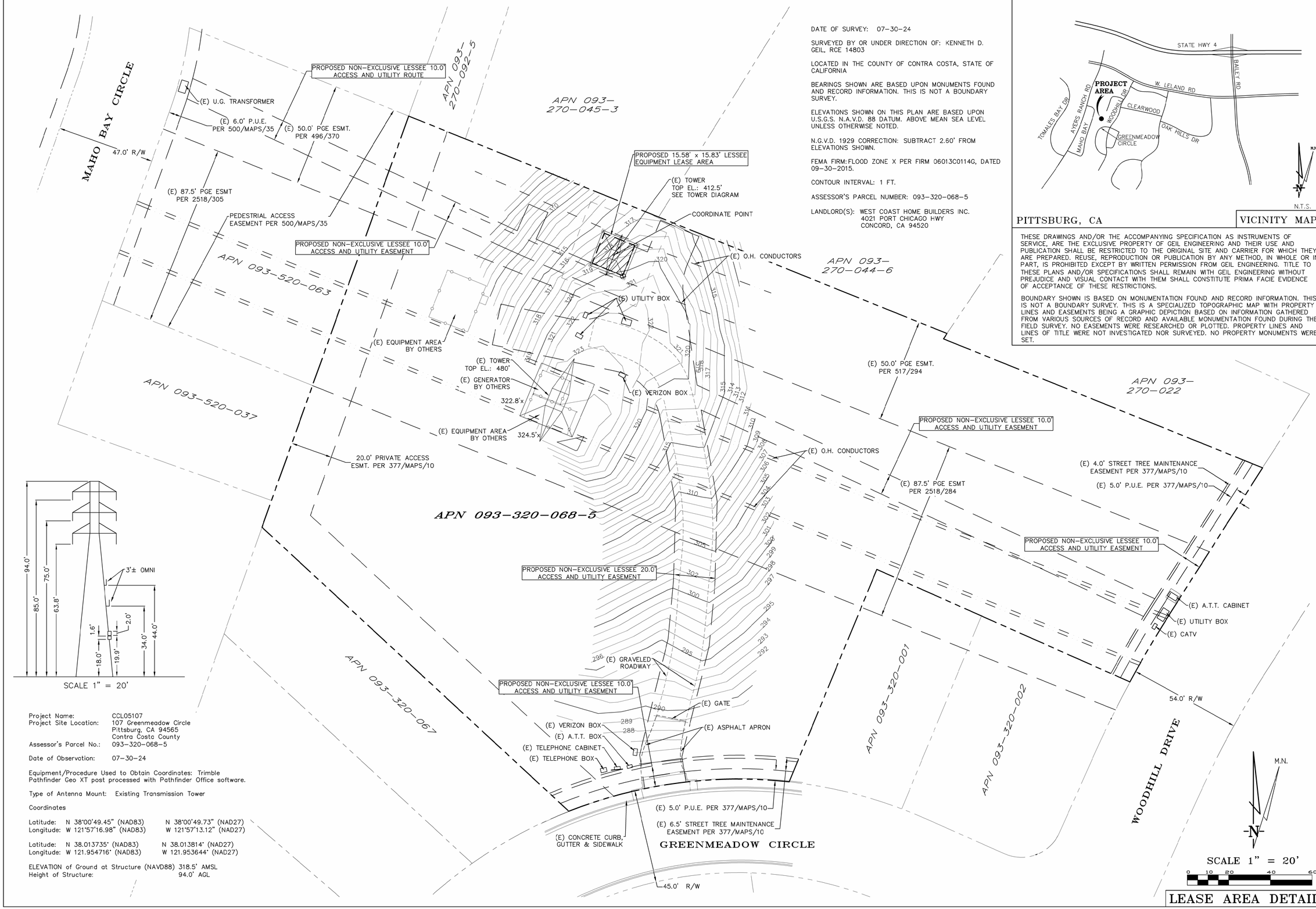
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SHEET TITLE:

TITLE SHEET

SHEET NUMBER:

T-1.1



Project Name: CCL05107
Project Site Location: 107 Greenmeadow Circle
Pittsburg, CA 94565
Contra Costa County
Assessor's Parcel No.: 093-320-068-5

Date of Observation: 07-30-24

Equipment/Procedure Used to Obtain Coordinates: Trimble Pathfinder Geo XT post processed with Pathfinder Office software.

Type of Antenna Mount: Existing Transmission Tower

Coordinates

Latitude: N 38°00'49.45" (NAD83) N 38°00'49.73" (NAD27)
Longitude: W 121°57'16.98" (NAD83) W 121°57'13.12" (NAD27)

Latitude: N 38.013735° (NAD83) N 38.013814° (NAD27)
Longitude: W 121.954716° (NAD83) W 121.953644° (NAD27)

ELEVATION of Ground at Structure (NAVD88) 318.5' AMSL
Height of Structure: 94.0' AGL

DATE OF SURVEY: 07-30-24

SURVEYED BY OR UNDER DIRECTION OF: KENNETH D. GEIL, RCE 14803

LOCATED IN THE COUNTY OF CONTRA COSTA, STATE OF CALIFORNIA

BEARINGS SHOWN ARE BASED UPON MONUMENTS FOUND AND RECORD INFORMATION. THIS IS NOT A BOUNDARY SURVEY.

ELEVATIONS SHOWN ON THIS PLAN ARE BASED UPON U.S.G.S. N.A.V.D. 88 DATUM. ABOVE MEAN SEA LEVEL UNLESS OTHERWISE NOTED.

N.G.V.D. 1929 CORRECTION: SUBTRACT 2.60' FROM ELEVATIONS SHOWN.

FEMA FIRM: FLOOD ZONE X PER FIRM 06013C0114G, DATED 09-30-2015.

CONTOUR INTERVAL: 1 FT.

ASSESSOR'S PARCEL NUMBER: 093-320-068-5

LANDLORD(S): WEST COAST HOME BUILDERS INC.
4021 PORT CHICAGO HWY
CONCORD, CA 94520

PITTSBURG, CA

VICINITY MAP

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DEPT	APPROVED	DATE
A&C		
RE		
RF		
INT		
EE\IN		
OPS		
EE\OUT		

Surveyor
GEIL ENGINEERING
ENGINEERING • SURVEYING • PLANNING
1226 HIGH STREET
AUBURN, CALIFORNIA 95603
phone: (530) 885-0428
fax: (530) 823-1309

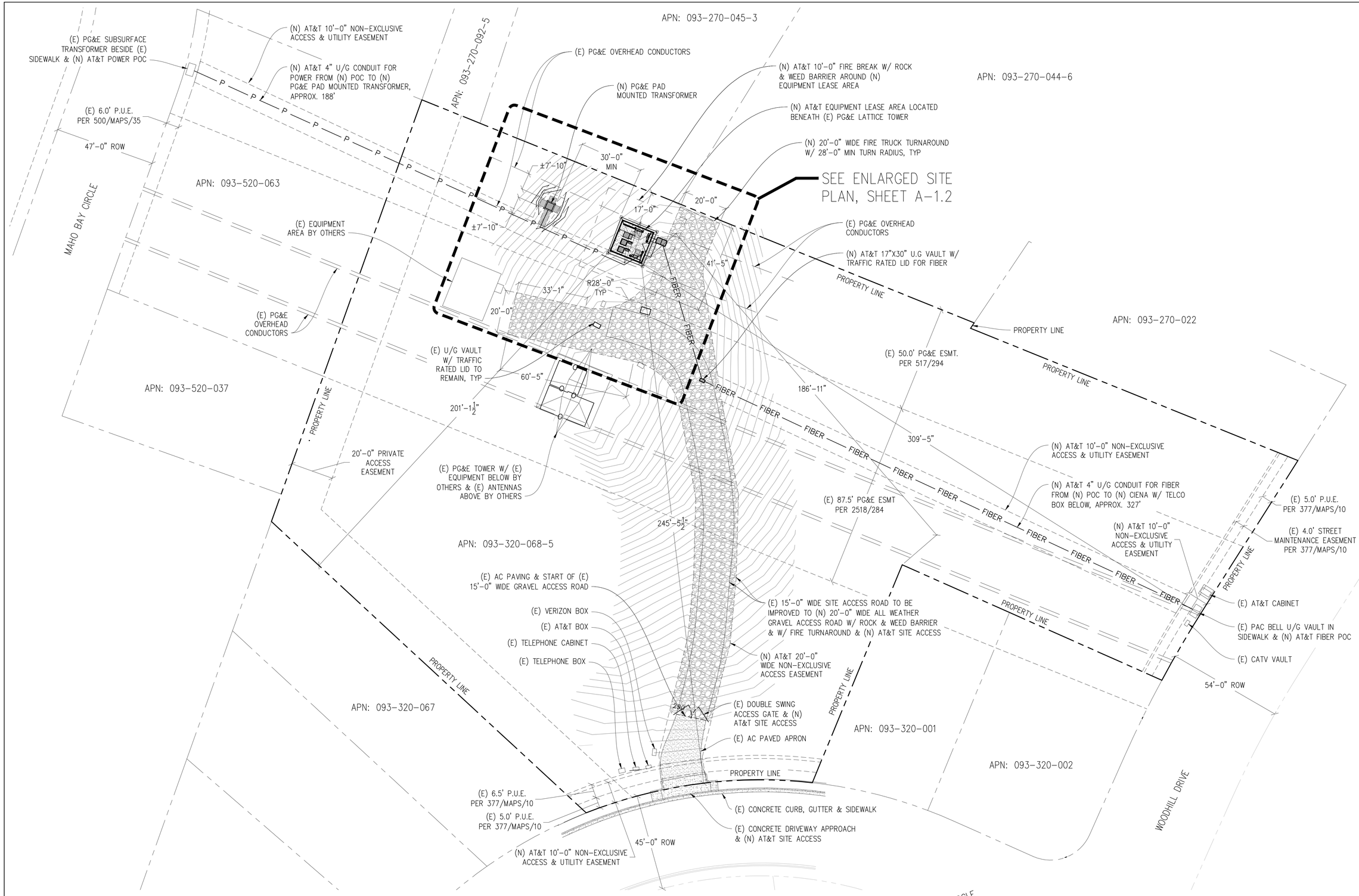
at&t MOBILITY

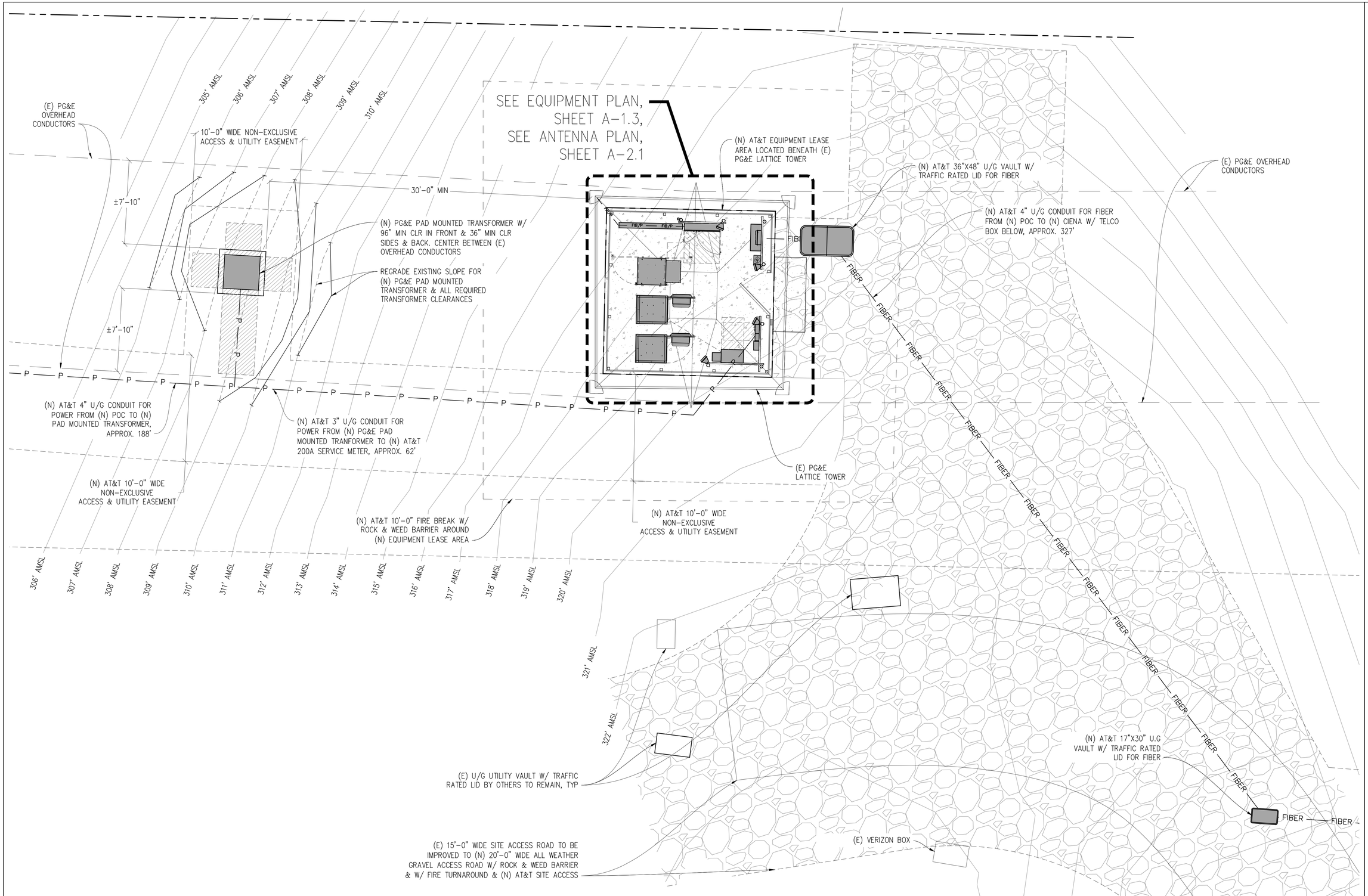
CCL05107
107 Greenmeadow Circle
Pittsburg, CA 94565

PLOT PLAN AND SITE TOPOGRAPHY

REVISIONS		
08-06-24	Preliminary Drawing	dg
08-27-24	update tower diag.	dg
01-23-25	rev. lease/esmts	dg
03-12-25	rev. lease/esmts	dg

Sheet
C-1


APN: 093-270-045-3
APN: 093-270-092-5
APN: 093-270-044-6
APN: 093-520-063
APN: 093-520-037
APN: 093-320-068-5
APN: 093-320-067
APN: 093-320-001
APN: 093-320-002
APN: 093-270-022
(E) PG&E SUBSURFACE TRANSFORMER BESIDE (E) SIDEWALK & (N) AT&T POWER POC
(N) AT&T 10'-0" NON-EXCLUSIVE ACCESS & UTILITY EASEMENT
(N) AT&T 4" U/G CONDUIT FOR POWER FROM (N) POC TO (N) PG&E PAD MOUNTED TRANSFORMER, APPROX. 188'
(E) 6.0' P.U.E. PER 500/MAPS/35
47'-0" ROW
MAHO BAY CIRCLE
(E) EQUIPMENT AREA BY OTHERS
(E) PG&E OVERHEAD CONDUCTORS
(E) PG&E OVERHEAD CONDUCTORS
(N) PG&E PAD MOUNTED TRANSFORMER
(N) AT&T 10'-0" FIRE BREAK W/ ROCK & WEED BARRIER AROUND (N) EQUIPMENT LEASE AREA
(N) AT&T EQUIPMENT LEASE AREA LOCATED BENEATH (E) PG&E LATTICE TOWER
(N) 20'-0" WIDE FIRE TRUCK TURNAROUND W/ 28'-0" MIN TURN RADIUS, TYP
SEE ENLARGED SITE PLAN, SHEET A-1.2
30'-0" MIN
±7'-10"
±7'-10"
17'-0"
20'-0"
41'-5"
33'-1"
R28'-0" TYP
20'-0"
(N) AT&T 17"X30" U.G VAULT W/ TRAFFIC RATED LID FOR FIBER
PROPERTY LINE
PROPERTY LINE
(E) U/G VAULT W/ TRAFFIC RATED LID TO REMAIN, TYP
60'-5"
201'-1 1/2"
FIBER
FIBER
FIBER



ENLARGED SITE PLAN

1/4"=1'-0"

0 1' 2' 4' 6' 10' 14' 20'

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

5005 Executive Parkway
San Ramon, California 94583

Vendor:

COMPLETE Wireless Consulting, Inc.

AT&T SITE NO:	CCL05107
PROJECT NO:	N/A
DRAWN BY:	T.T.
CHECKED BY:	J. GRAY
APPROVED BY:	-

ISSUE STATUS

REV	DATE	DESCRIPTION	CAD
2	03/11/25	CLIENT REV	T.T.
1	01/23/25	ZD 100%	T.T.
0	08/30/24	ZD 90%	T.T.

Licensee:

PRELIMINARY: NOT FOR CONSTRUCTION

KEVIN R. SORENSEN
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ENGINEER:

Streamline Engineering and Design, Inc.
3843 Taylor Road, Suite A, Loomis, CA 95650
Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

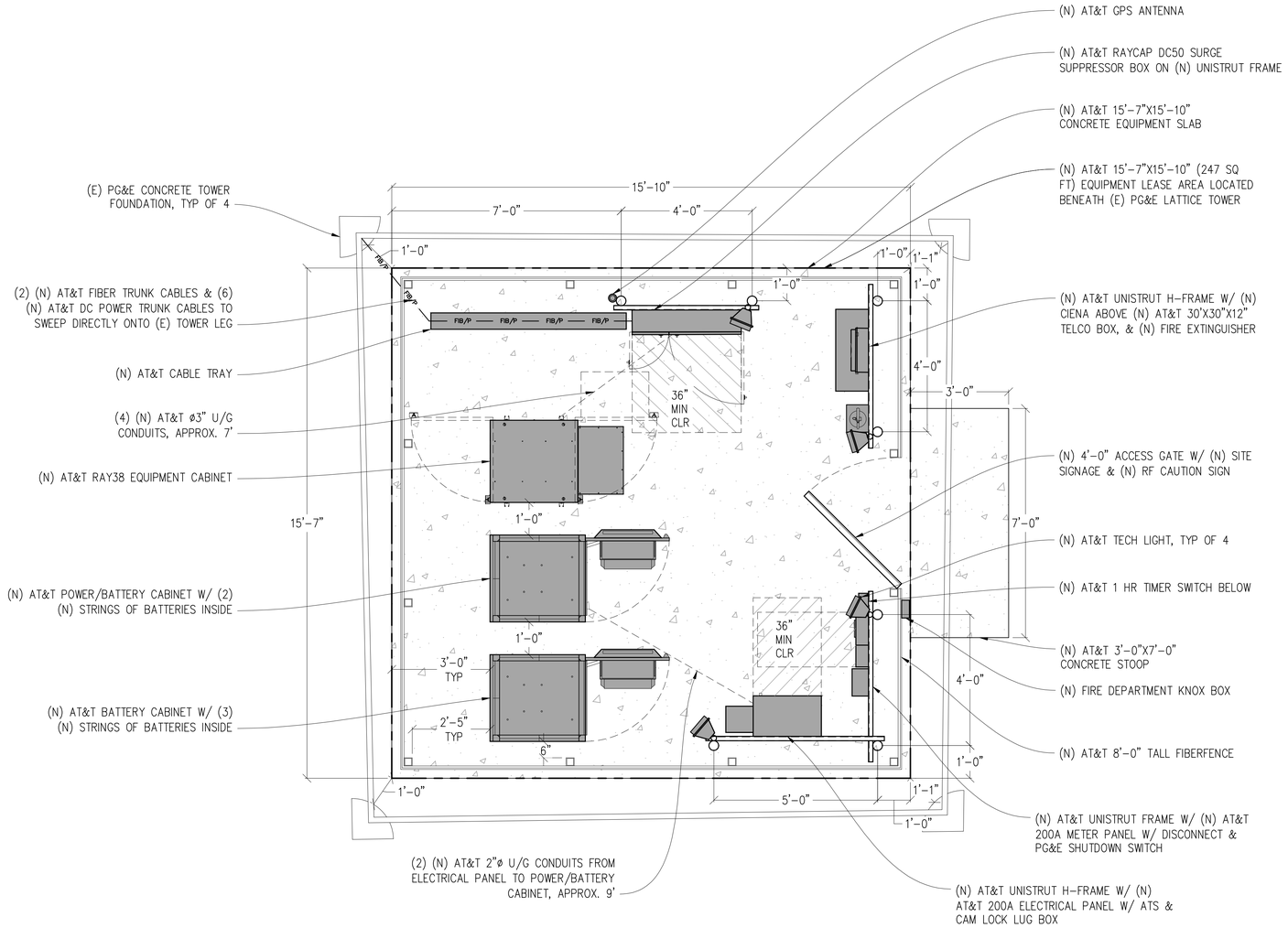
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SHEET TITLE:

ENLARGED SITE PLAN

SHEET NUMBER:

A-1.2



NOTE: PROVIDE (N) AT&T 10'-0" FIRE BREAK W/ ROCK & WEED BARRIER AROUND (N) EQUIPMENT LEASE AREA

EQUIPMENT PLAN

½"=1'-0"

0 6" 1' 2' 3' 5' 7' 10'

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

5005 Executive Parkway
San Ramon, California 94583

Vendor:

COMPLETE Wireless Consulting, Inc.

AT&T SITE NO:	CCL05107
PROJECT NO:	N/A
DRAWN BY:	T.T.
CHECKED BY:	J. GRAY
APPROVED BY:	-

ISSUE STATUS

REV	DATE	DESCRIPTION	CAD
2	03/11/25	CLIENT REV	T.T.
1	01/23/25	ZD 100%	T.T.
0	08/30/24	ZD 90%	T.T.

Licensee:

PRELIMINARY: NOT FOR CONSTRUCTION

KEVIN R. SORENSEN
S4469

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ENGINEER:

Streamline Engineering and Design Inc.

3843 Taylor Road, Suite A, Loomis, CA 95650
Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

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SHEET TITLE:

EQUIPMENT PLAN

SHEET NUMBER:

A-1.3

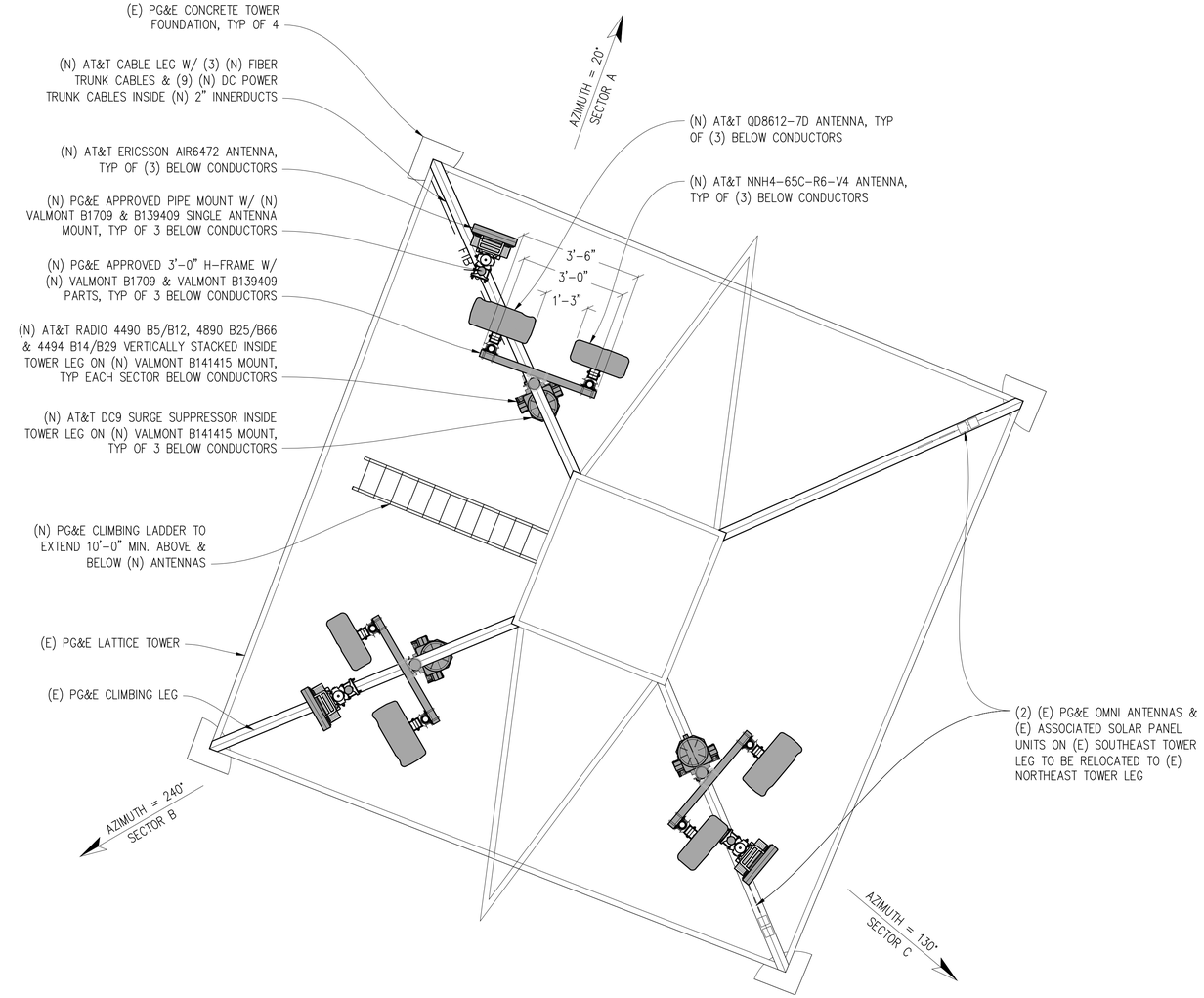
ANTENNA & CABLE SCHEDULE (PRELIMINARY & SUBJECT TO CHANGE)

SECTOR		ANTENNA MODEL NO.	AZIMUTH	CENTERLINE	RRU NO'S & MODEL #	JUMPERS	# OF DC POWER CABLES	# OF FIBER CABLES	LENGTH OF CABLES	SURGE SUPPRESSOR	NO. OF DIPLEXERS	NO. OF COMBINERS
ALPHA	A1	QUINTEL QD8612-7D	20°	±49'-10"	(1) 4490 B5/B12A, (1) 4890 B25/B66	-	(3)	(1)	-	(1) DC9	0	0
	A2	COMMSCOPE NNH4-65C-R6-V4	20°	±49'-10"	(1) 4494 B14/B29	-	SHARED	SHARED	-	SHARED	0	0
	A3	ERICSSON AIR6472 B77G/B77M	20°	±42'-3"	INTEGRATED	-	SHARED	SHARED	-	SHARED	0	0
BETA	B1	QUINTEL QD8612-7D	240°	±49'-10"	(1) 4490 B5/B12A, (1) 4890 B25/B66	-	(3)	(1)	-	(1) DC9	0	0
	B2	COMMSCOPE NNH4-65C-R6-V4	240°	±49'-10"	(1) 4494 B14/B29	-	SHARED	SHARED	-	SHARED	0	0
	B3	ERICSSON AIR6472 B77G/B77M	240°	±42'-3"	INTEGRATED	-	SHARED	SHARED	-	SHARED	0	0
GAMMA	C1	QUINTEL QD8612-7D	130°	±49'-10"	(1) 4490 B5/B12A, (1) 4890 B25/B66	-	(3)	(1)	-	(1) DC9	0	0
	C2	COMMSCOPE NNH4-65C-R6-V4	130°	±49'-10"	(1) 4494 B14/B29	-	SHARED	SHARED	-	SHARED	0	0
	C3	ERICSSON AIR6472 B77G/B77M	130°	±42'-3"	INTEGRATED	-	SHARED	SHARED	-	SHARED	0	0

RFDS DATE	10/14/24

NOTE:
1. ANTENNA POSITIONS ARE LEFT TO RIGHT FROM BACK OF SECTOR
2. EQUIPMENT IS PRELIMINARY & SUBJECT TO CHANGE.

NOTE: MAINTAIN 16" MIN SEPARATION BETWEEN ALL VERTICALLY STACKED RADIOS & SURGE PROTECTOR



TN

ANTENNA PLAN

1/2"=1'-0"

0 6" 1' 2' 3' 5' 7' 10'

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

5005 Executive Parkway
San Ramon, California 94583

Vendor:

COMPLETE
Wireless Consulting, Inc.

AT&T SITE NO:	CCL05107
PROJECT NO:	N/A
DRAWN BY:	T.T.
CHECKED BY:	J. GRAY
APPROVED BY:	-

ISSUE STATUS

REV	DATE	DESCRIPTION	CAD
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1	01/23/25	ZD 100%	T.T.
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KEVIN R. SORENSEN
S4469

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ENGINEER:

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3843 Taylor Road, Suite A, Loomis, CA 95650
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E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

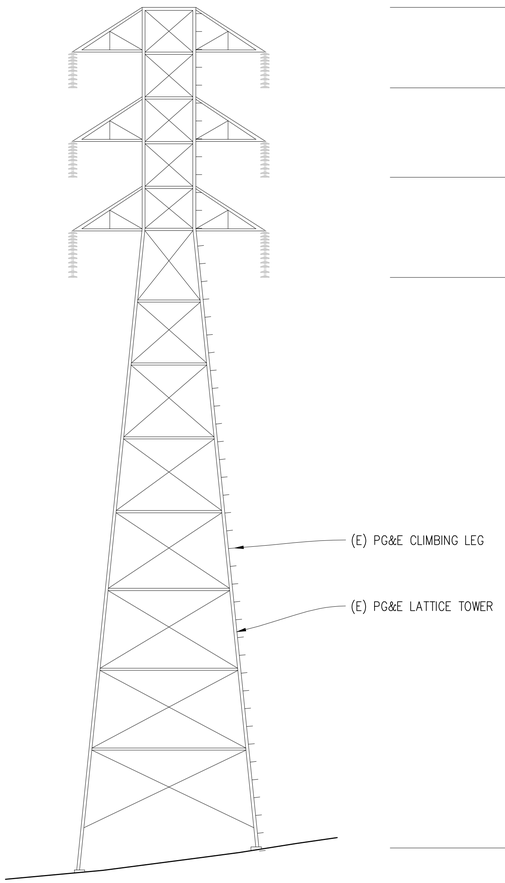
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SHEET TITLE:

ANTENNA PLANS

SHEET NUMBER:

A-2.1



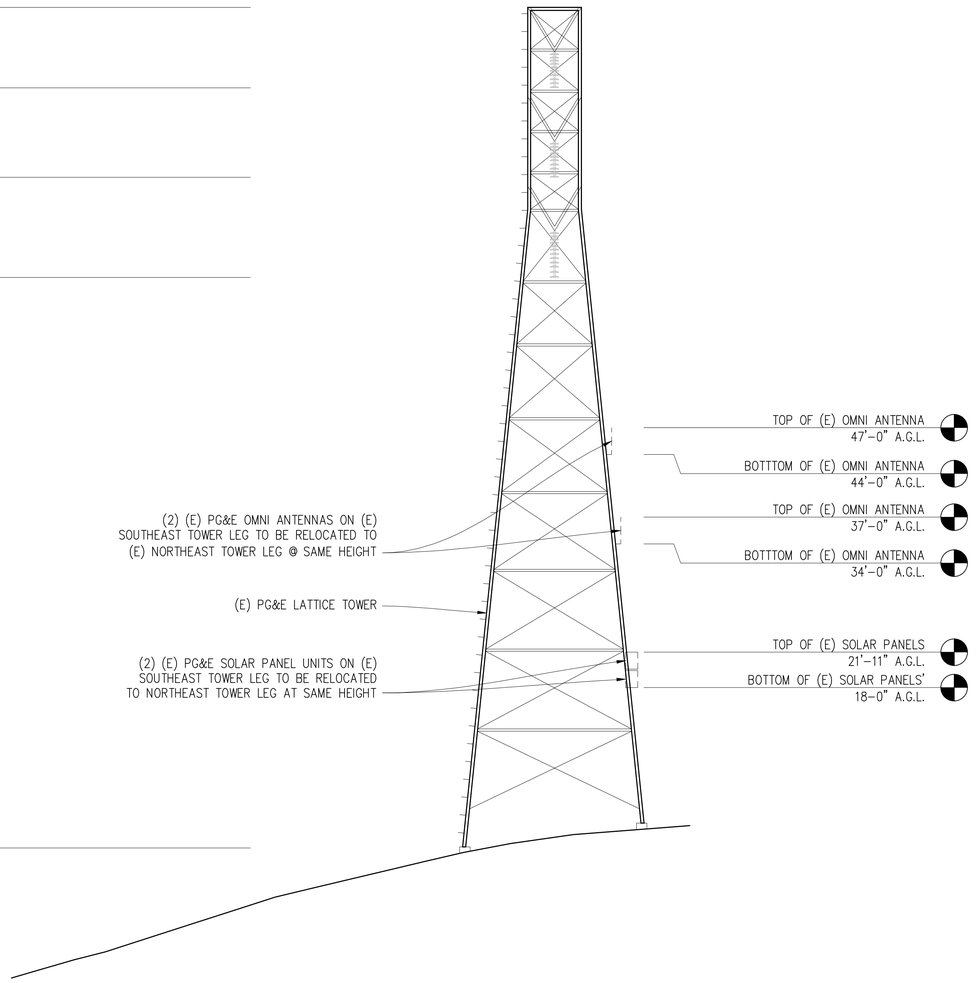
TOP OF (E) PG&E LATTICE TOWER
94'-0" A.G.L.

BOTTOM OF (E) PG&E CONDUCTORS
85'-0" A.G.L.

BOTTOM OF (E) PG&E CONDUCTORS
75'-0" A.G.L.

BOTTOM OF (E) PG&E CONDUCTORS
63'-.10' A.G.L.

GROUND LEVEL @ CENTER OF (E) TOWER
0.0' A.G.L. (318.5' AMSL)



(E) WEST ELEVATION

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

(E) SOUTH ELEVATION

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

5005 Executive Parkway
San Ramon, California 94583

Vendor:

COMPLETE
Wireless Consulting, Inc.

AT&T SITE NO:	CCL05107
PROJECT NO:	N/A
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CHECKED BY:	J. GRAY
APPROVED BY:	-

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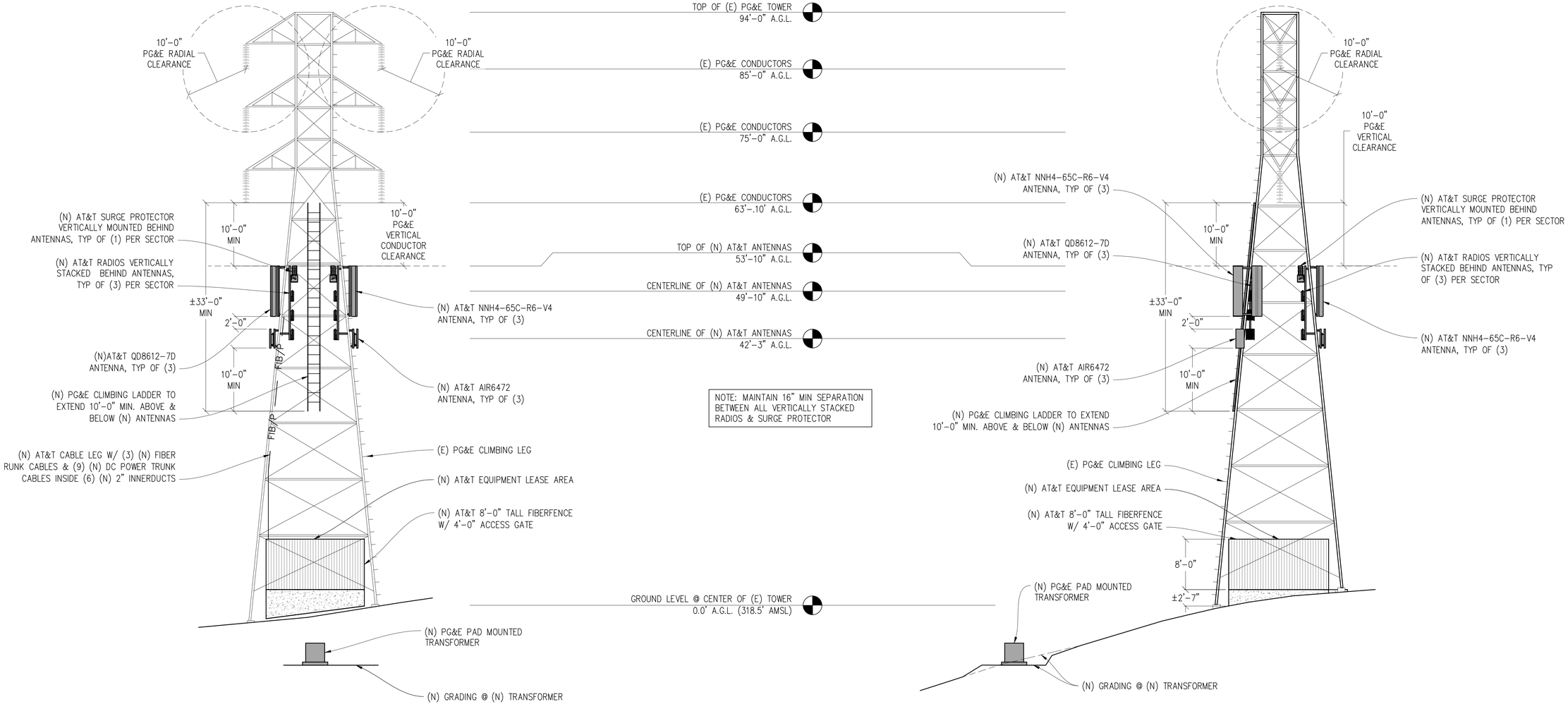
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SHEET TITLE:

(E) ELEVATIONS

SHEET NUMBER:

A-3.1



(N) WEST ELEVATION

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

(N) SOUTH ELEVATION

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

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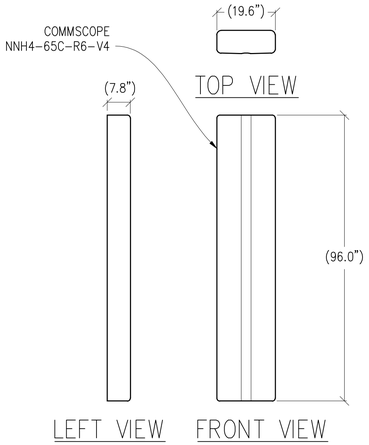
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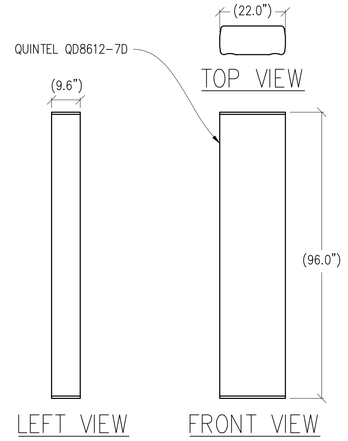
(N) ELEVATIONS

SHEET NUMBER:

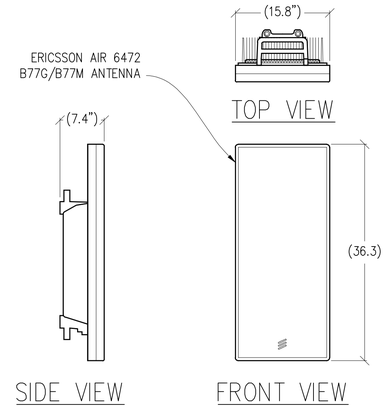
A-3.2



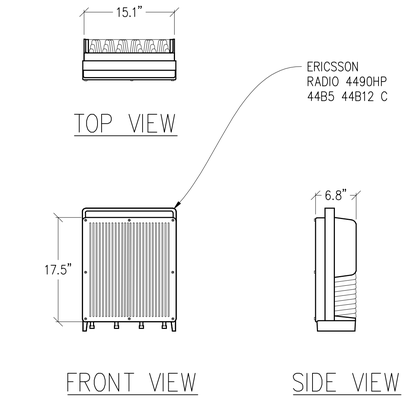
1 ANTENNA DETAIL
½"=1' MAX WEIGHT: 100.53 LBS



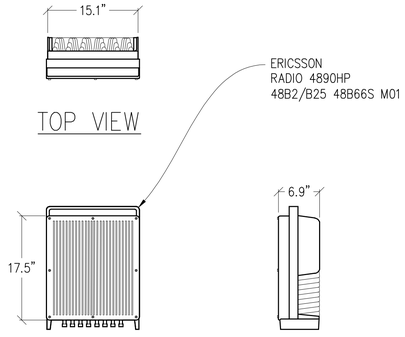
2 ANTENNA DETAIL
½"=1'-0" WEIGHT: 126.5 LBS



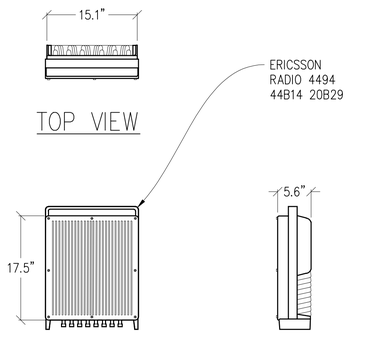
3 ANTENNA DETAIL
1"=1'-0" MAX WEIGHT: 88.62 LBS



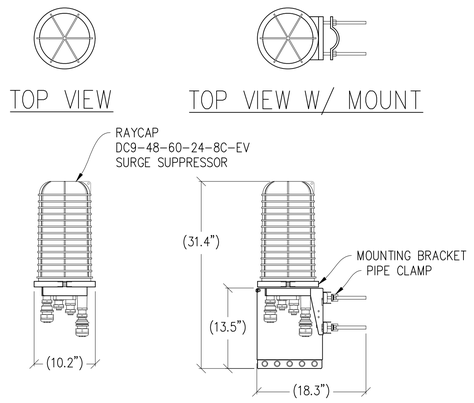
4 RADIO 4490HP DETAIL
1"=1'-0" MAX WEIGHT: 68.0 LBS



5 RADIO 4890HP DETAIL
1"=1'-0" MAX WEIGHT: 68.0 LBS



6 RADIO 4494 DETAIL
1"=1'-0" MAX WEIGHT: 57.3 LBS



7 SURGE SUPPRESSOR DETAIL
1"=1'-0" MAX WEIGHT = 26.2 LBS

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

5005 Executive Parkway
San Ramon, California 94583

Vendor:

COMPLETE
Wireless Consulting, Inc.

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APPROVED BY:	-

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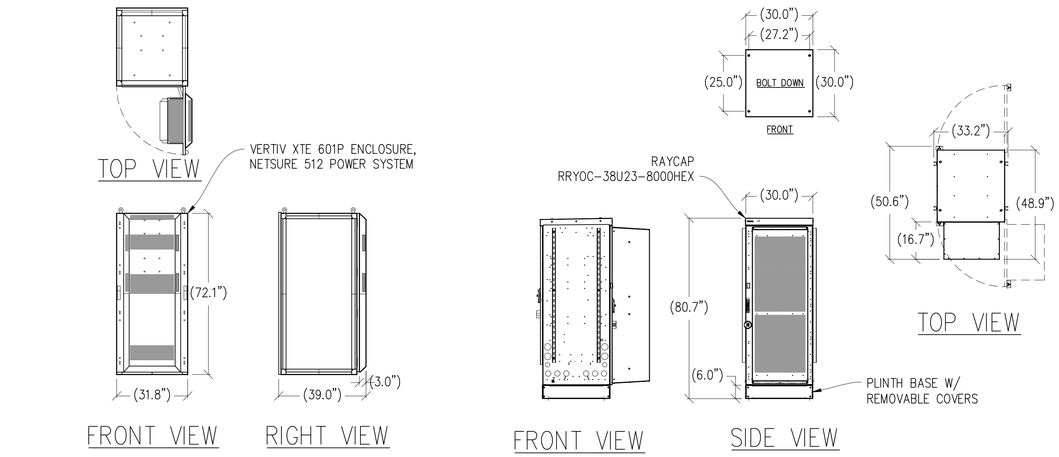
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SHEET TITLE:

ANTENNA
DETAILS

SHEET NUMBER:

A-4.1

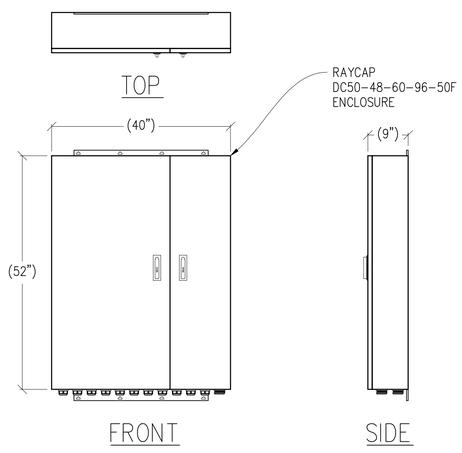


1 DC POWER PLANT DETAIL

⅜"=1'-0" MAX WEIGHT: 2348 LBS W/ (8) BATTERIES

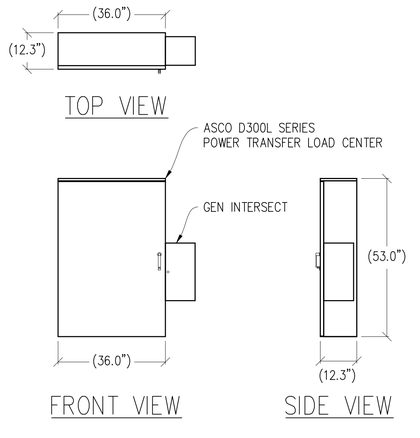
2 RAY38 DETAIL

⅜"=1'-0" EMPTY WEIGHT: 1440 LBS



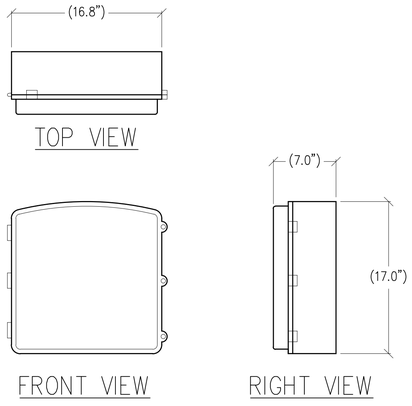
3 RAYCAP DC50 DETAIL

¾"=1'-0" MAX WEIGHT: 165 LBS



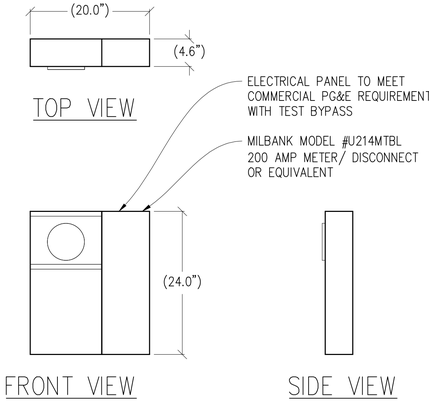
4 ELECTRICAL PANEL DETAIL

½"=1'-0" MAX WEIGHT: 210 LBS



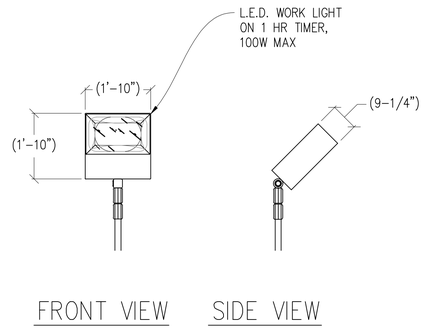
5 CN 3931 DETAIL

1½"=1'-0" MAX WEIGHT: 28.6 LBS



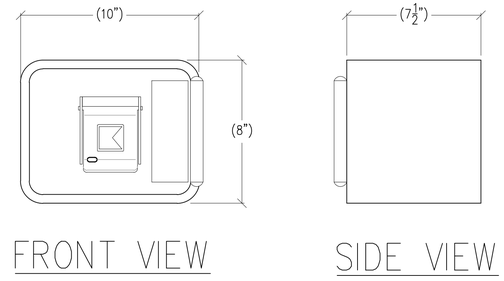
6 METER DETAIL

1"=1'-0"



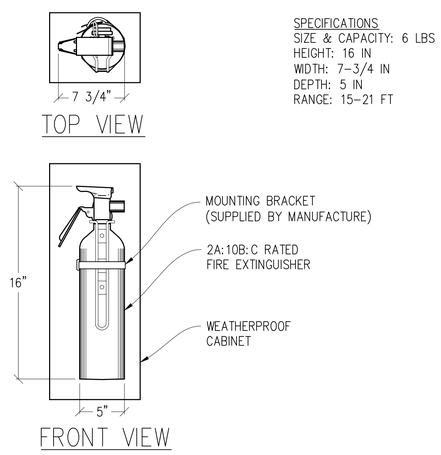
7 TECH LIGHT DETAIL

½"=1'-0"



8 KNOX-BOX 3200 DETAIL

3"=1'-0"



9 FIRE EXTINGUISHER DETAIL

N.T.S.

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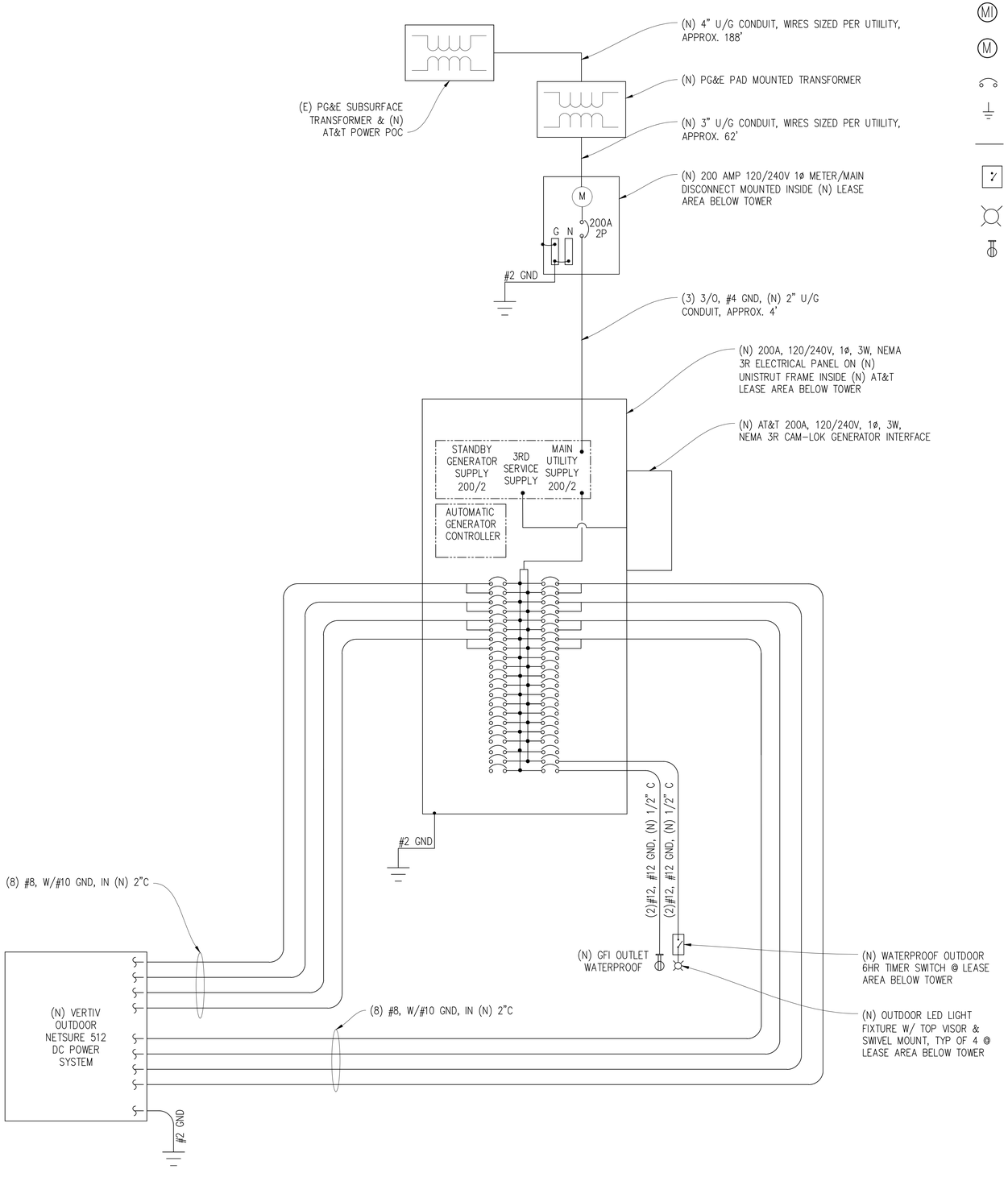
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EQUIPMENT
DETAILS

SHEET NUMBER:

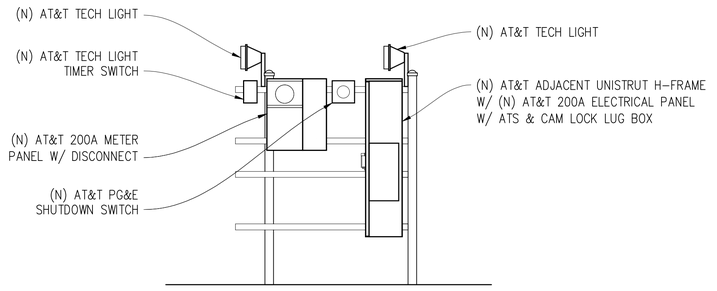
A-4.2



SINGLE LINE DIAGRAM

ELECTRICAL LEGEND

- MI — MECHANICAL INTERLOCK
- M — METER
- CIRCUIT BREAKER
- SERVICE GROUND
- WIRED CONNECTION
- TIMER SWITCH, WATERPROOF
- OUTDOOR LIGHT
- GFI OUTLET, WATERPROOF



(N) H-FRAME ELEVATION

NAMEPLATE : PANEL A			SC LEVEL : 10,000				VOLTS: 120V/240V, 1ø		
LOCATION : OUTSIDE							BUS AMPS: 200A		
MOUNTING : UNISTRUT FRAME							MAIN CB: 200A		
ØA	ØB		BKR AMP/ POLE	CIRCUIT NO		BKR AMP/ POLE		ØA	ØB
LOAD VA	LOAD VA	LOAD DESCRIPTION					LOAD DESCRIPTION	LOAD VA	LOAD VA
2150		RECTIFIERS 1 & 2	30/2	1	2	30/2	RECTIFIERS 3 & 4	2150	
	2150	" "	" "	3	4	" "	" "		2150
2150		RECTIFIERS 5 & 6	30/2	5	6	30/2	RECTIFIERS 7 & 8	2150	
	2150	" "	" "	7	8	" "	" "		2150
2150		RECTIFIERS 9 & 10	30/2	9	10	30/2	RECTIFIERS 11 & 12	2150	
	2150	" "	" "	11	12	" "	" "		2150
2150		RECTIFIERS 13 & 14	30/2	13	14	30/2	RECTIFIERS 15 & 16	2150	
	2150	" "	" "	15	16	" "	" "		2150
0		BLANK	–	17	18	–	BLANK	0	
	0	" "	–	19	20	–	" "		0
0		" "	–	21	22	–	" "	0	
	0	" "	–	23	24	–	" "		0
0		" "	–	25	26	–	" "	0	
	0	" "	–	27	28	–	" "		0
0		" "	–	29	30	–	" "	0	
	0	" "	–	31	32	–	" "		0
0		" "	–	33	34	–	" "	0	
	0	" "	–	35	36	–	" "		0
0		" "	–	37	38	–	" "	0	
	0	" "	–	39	40	20/1	TECH LIGHTS		300
0		" "	–	41	42	20/1	GFI RECEPTACLE	180	
8600	8600	PHASE TOTALS					PHASE TOTALS	8780	8900
TOTAL VA =	34880	TOTAL AMPS =	145						

NEW PANEL SCHEDULE

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PRELIMINARY: NOT FOR CONSTRUCTION

KEVIN R. SORENSEN
S4469

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.

ENGINEER:

Streamline Engineering and Design, Inc.
3843 Taylor Road, Suite A, Loomis, CA 95650
Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

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SHEET TITLE:

ELECTRICAL PLAN

SHEET NUMBER:

E-1.1

Federal Communications Commission - Local and State Government Advisory Committee
(June 2000)

A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance

Over the past two years, the Federal Communications Commission (FCC) and its Local and State Government Advisory Committee (LSGAC) have been working together to prepare a voluntary guide to assist state and local governments in devising efficient procedures for ensuring that the antenna facilities located in their communities comply with the FCC's limits for human exposure to radiofrequency (RF) electromagnetic fields. The attached guide is the product of this joint effort.

We encourage state and local government officials to consult this guide when addressing issues of facilities siting within their communities. This guide contains basic information, in a form accessible to officials and citizens alike, that will alleviate misunderstandings in the complex area of RF emissions safety. This guide is not intended to replace OET Bulletin 65, which contains detailed technical information regarding RF issues, and should continue to be used and consulted for complex sites. The guide contains information, tables, and a model checklist to assist state and local officials in identifying sites that do not raise concerns regarding compliance with the Commission's RF exposure limits. In many cases, the model checklist offers a quick and effective way for state and local officials to establish that particular RF facilities are unlikely to exceed specific federal guidelines that protect the public from the environmental effects of RF emissions. Thus, we believe this guide will facilitate federal, state, and local governments working together to protect the public while bringing advanced and innovative communications services to consumers as rapidly as possible. We hope and expect that use of this guide will benefit state and local governments, service providers, and, most importantly, the American public.

We wish all of you good luck in your facilities siting endeavors.

William E. Kennard, Chairman
Federal Communications Commission

Kenneth S. Fellman, Chair
Local and State Government
Advisory Committee

Federal Communications Commission - Local and State Government Advisory Committee (June 2000)

A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance

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APPENDIX A

Optional Checklist for Local Government
To Determine Whether a Facility is Categorically Excluded

Purpose: The FCC has determined that many wireless facilities are unlikely to cause human exposures in excess of RF exposure guidelines. Operators of those facilities are exempt from routinely having to determine their compliance. These facilities are termed "categorically excluded." Section 1.1307(b)(1) of the Commission's rules defines those categorically excluded facilities. This checklist will assist state and local government agencies in identifying those wireless facilities that are categorically excluded, and thus are highly unlikely to cause exposure in excess of the FCC's guidelines. Provision of the information identified on this checklist may also assist FCC staff in evaluating any inquiry regarding a facility's compliance with the RF exposure guidelines.

BACKGROUND INFORMATION

1. Facility Operator's Legal Name: New Cingular Wireless, PCS, LLC (AT&T)
2. Facility Operator's Mailing Address: 5001 Executive Pkwy, 4W850T, San Ramon, CA 94583
3. Facility Operator's Contact Name/Title: Phillip DeGuzman
4. Facility Operator's Office ~~Telephone:~~ Email - pd8326@att.com
5. Facility Operator's Fax:
6. Facility Name: CCL05107 - Oak Hills
7. Facility Address: 107 Greenmeadow Circle
8. Facility City/Community: Pittsburg
9. Facility State and Zip Code: CA, 94565
10. Latitude: N 38.013735 (NAD 83)
11. Longitude: W 121.954716 (NAD 83)

continue

Optional Local Government Checklist (page 2)

EVALUATION OF CATEGORICAL EXCLUSION

12. Licensed Radio Service (see attached Table 1): PCS 26
13. Structure Type (free-standing or building/roof-mounted): PG&E Tower Collocation
14. Antenna Type [omnidirectional or directional (includes sectored)]: Directional
15. Height above ground of the lowest point of the antenna (in feet): ~~41' at bottom of antennas~~ (53' to top antennas, 94' tower)
16. ☒ Check if all of the following are true:
    (a) This facility will be operated in the Multipoint Distribution Service, Paging and Radiotelephone Service, Cellular Radiotelephone Service, Narrowband or Broadband Personal Communications Service, Private Land Mobile Radio Services Paging Operations, Private Land Mobile Radio Service Specialized Mobile Radio, Local Multipoint Distribution Service, or service regulated under Part 74, Subpart I (see question 12).
    (b) This facility will not be mounted on a building (see question 13).
    (c) The lowest point of the antenna will be at least 32.8 feet (10 meters) above the ground (see question 15).

If box 16 is checked, this facility is categorically excluded and is unlikely to cause exposure in excess of the FCC's guidelines. The remainder of the checklist need not be completed. If box 16 is not checked, continue to question 17.

17. Enter the power threshold for categorical exclusion for this service from the attached Table 1 in watts ERP or EIRP* (note: EIRP = (1.64) X ERP): _____
18. Enter the total number of channels if this will be an omnidirectional antenna, or the maximum number of channels in any sector if this will be a sectored antenna:
19. Enter the ERP or EIRP per channel (using the same units as in question 17): _____
20. Multiply answer 18 by answer 19: _____
21. Is the answer to question 20 less than or equal to the value from question 17 (yes or no)?

If the answer to question 21 is YES, this facility is categorically excluded. It is unlikely to cause exposure in excess of the FCC's guidelines.

If the answer to question 21 is NO, this facility is not categorically excluded. Further investigation may be appropriate to verify whether the facility may cause exposure in excess of the FCC's guidelines.

*"ERP" means "effective radiated power" and "EIRP" means "effective isotropic radiated power

TABLE 1: TRANSMITTERS, FACILITIES AND OPERATIONS SUBJECT TO ROUTINE ENVIRONMENTAL EVALUATION

SERVICE (TITLE 47 CFR RULE PART)	EVALUATION REQUIRED IF:
Experimental Radio Services (part 5)	power > 100 W ERP (164 W EIRP)
Multipoint Distribution Service (subpart K of part 21)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and power > 1640 W EIRP building-mounted antennas: power > 1640 W EIRP
Paging and Radiotelephone Service (subpart E of part 22)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and power > 1000 W ERP (1640 W EIRP) building-mounted antennas: power > 1000 W ERP (1640 W EIRP)
Cellular Radiotelephone Service (subpart H of part 22)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and total power of all channels > 1000 W ERP (1640 W EIRP) building-mounted antennas: total power of all channels > 1000 W ERP (1640 W EIRP)

TABLE 1 (cont.)

SERVICE (TITLE 47 CFR RULE PART)	EVALUATION REQUIRED IF:
Personal Communications Services (part 24)	(1) Narrowband PCS (subpart D): non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and total power of all channels > 1000 W ERP (1640 W EIRP) building-mounted antennas: total power of all channels > 1000 W ERP (1640 W EIRP) (2) Broadband PCS (subpart E): non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and total power of all channels > 2000 W ERP (3280 W EIRP) building-mounted antennas: total power of all channels > 2000 W ERP (3280 W EIRP)
Satellite Communications (part 25)	all included
General Wireless Communications Service (part 26)	total power of all channels > 1640 W EIRP
Wireless Communications Service (part 27)	total power of all channels > 1640 W EIRP
Radio Broadcast Services (part 73)	all included

TABLE 1 (cont.)

SERVICE (TITLE 47 CFR RULE PART)	EVALUATION REQUIRED IF:
Experimental, auxiliary, and special broadcast and other program distributional services (part 74)	subparts A, G, L: power > 100 W ERP subpart I: non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and power > 1640 W EIRP building-mounted antennas: power > 1640 W EIRP
Stations in the Maritime Services (part 80)	ship earth stations only
Private Land Mobile Radio Services Paging Operations (part 90)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and power > 1000 W ERP (1640 W EIRP) building-mounted antennas: power > 1000 W ERP (1640 W EIRP)
Private Land Mobile Radio Services Specialized Mobile Radio (part 90)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and total power of all channels > 1000 W ERP (1640 W EIRP) building-mounted antennas: total power of all channels > 1000 W ERP (1640 W EIRP)

TABLE 1 (cont.)

SERVICE (TITLE 47 CFR RULE PART)	EVALUATION REQUIRED IF:
Amateur Radio Service (part 97)	transmitter output power > levels specified in § 97.13(c)(1) of this chapter
Local Multipoint Distribution Service (subpart L of part 101)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and power > 1640 W EIRP building-mounted antennas: power > 1640 W EIRP LMDS licensees are required to attach a label to subscriber transceiver antennas that: (1) provides adequate notice regarding potential radiofrequency safety hazards, *e.g.,* information regarding the safe minimum separation distance required between users and transceiver antennas; and (2) references the applicable FCC-adopted limits for radiofrequency exposure specified in § 1.1310 of this chapter.

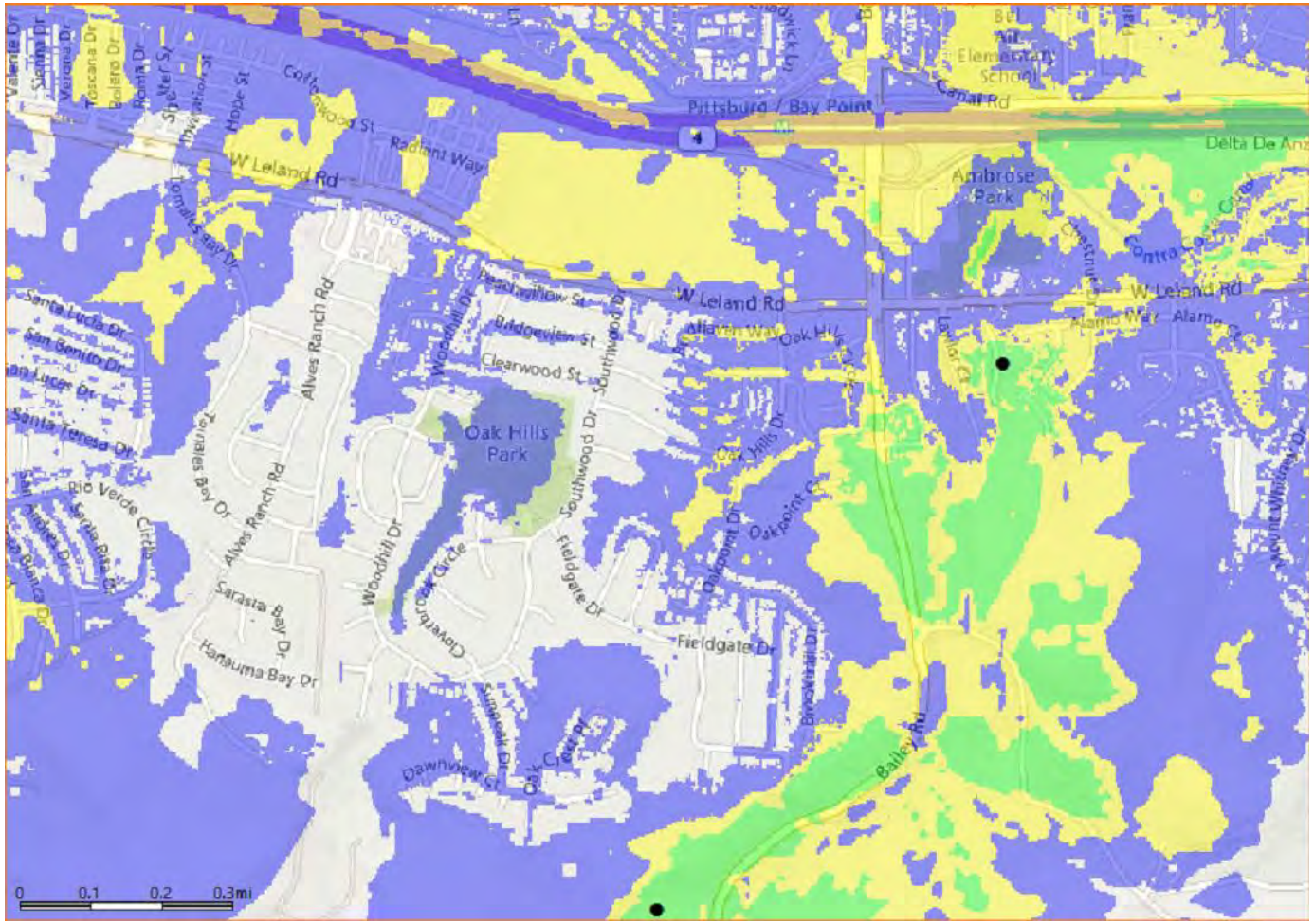
-end-

Propagation Map

CCL05107

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Existing LTE 1900 RSRP



Legend

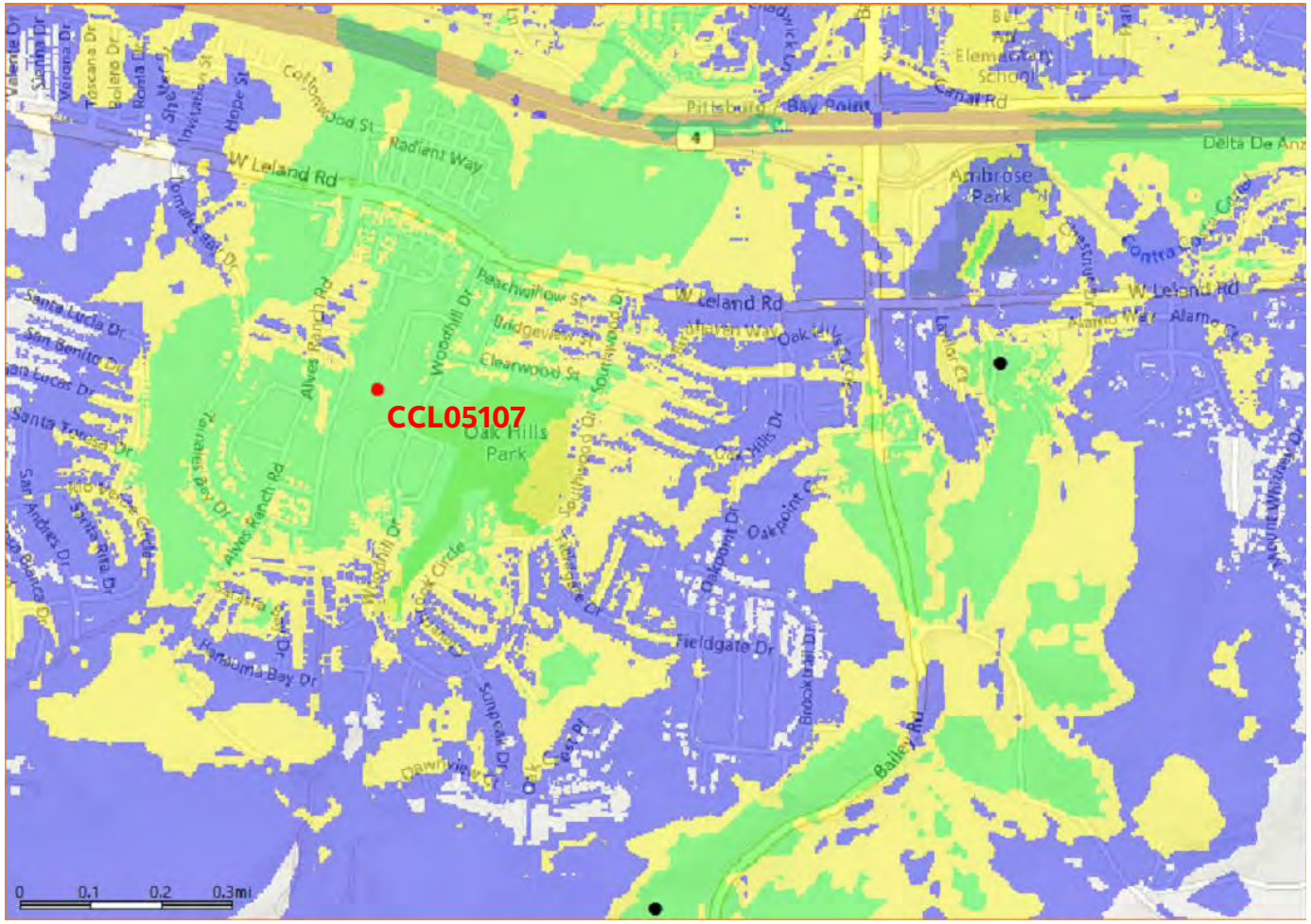
- Reliable Service Indoors/Outdoors
- Reliable Coverage in Transit
  Indoor Coverage Less Reliable
- Reliable Coverage Outdoors Only
  Indoor Coverage Less Reliable
- Existing site
- Proposed site

N

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AT&T

Proposed LTE 1900 RSRP with CCL05107



Legend

- Reliable Service Indoors/Outdoors
- Reliable Coverage in Transit
  Indoor Coverage Less Reliable
- Reliable Coverage Outdoors Only
  Indoor Coverage Less Reliable
- Existing site
- Proposed site

N

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AT&T


AT&T

Alternative Sites Analysis
CCL05107

AT&T is seeking a site in this portion of Pittsburg to serve the Oak Hills community and Highway 4 corridor just west of Pittsburg Bart station. The following figure shows the general area AT&T radio frequency (RF) engineers identified to address the existing significant coverage gap.

The search area spans from two jurisdictions, City of Pittsburg and Concord. Initially, it covered a vacant area now being developed into a residential neighborhood. AT&T's goal is to extend coverage in this area, with a centerline height of 100-120 feet, adjustable based on the final location.

AT&T faced challenges with the original search ring (red outline), as large real estate developers owned it. Two rejected AT&T's proposals, and the other two did not respond, despite numerous attempts to outreach. Expanding the search ring westward did not help, as the new areas were still owned by the same developers (blue outline). AT&T Radio Frequency Engineers then directed us to a PG&E tower outside the original search ring to the north (green outline). Although accepted, the property was undeveloped, and the owner was not interested in providing easements. Additionally, the area was federally owned, complicating contact and response times. AT&T decided to pursue a neighboring PG&E tower, which already hosts other carriers and has open space.



The proposed location on Greenmeadow Circle was selected because it is separated by a 2-acre lot that currently houses two tall 90' PG&E lattice transformer towers which one currently have wireless antennas from another carrier. The facility will provide connecting coverage with other AT&T sites in the area that currently support the area that are currently over capacity and is causing the network to be 'stressed.'

Areas surrounding the third expanded search ring do not offer suitable tower placement as the neighborhood consists of residential homes that we would like to avoid yet serve as much as possible. This location has a large residential population of an estimated 3500 residents.

This PG&E collocation is the least intrusive option for addressing the existing significant coverage gap. The site has a well-maintained access road. See below detailed information on the additional candidates in the area and the reason why these candidates are not viable.

1. **Private Real Estate Investor Group A.**



a. Rosa Blanca Dr, Pittsburg, CA 94565. Assessors Map, Book 92, Page 1 N ½ SEC 22 T2N R1W MDBM.
b. Bailey Rd, Pittsburg, CA 94565. Assessors Map, Book 92, Page 2, POR SEC ¼ 21 & POR SW ¼ SEC 22 T2N R1W MDBM.
c. Bailey Rd. Pittsburg, CA 94565. Assessors Map, Book 92, Page 4, POR SEC 22,23,26,27 T2N R1W MDBM.
d. Bailey Rd, Pittsburg, CA 94565. Assessors Map, Book 92, Page 5, POR SEC 26, 27 T2N R1W MDBM.

AT&T evaluated the opportunity to partner with a private real estate group a in Pittsburg, an area currently in the early stages of development as a new residential neighborhood for approximately 1500 homes. AT&T reached out via U.S. Mail to initiate discussions but received confirmation that the landowners were not interested in pursuing collaboration. Therefore, this candidate is not feasible, as securing a willing landlord is essential for facility placement.

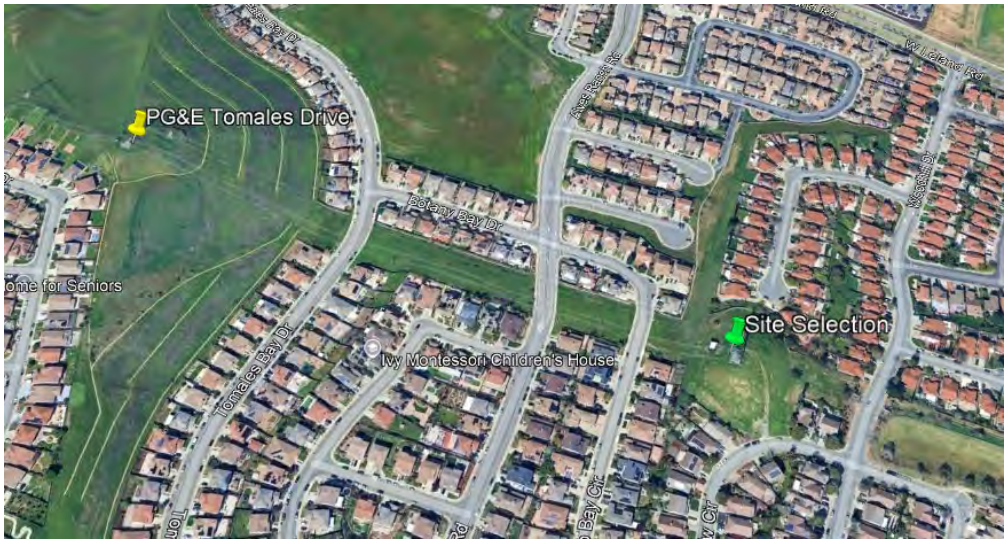
2. **Private Real Estate Investor Group B.**



Alves Ranch Rd, Pittsburg, CA 94565. Assessors Map Book 92, Page 1, N1/2 SEC 22 T2N R1W MDBM.

AT&T evaluated the opportunity to partner with a private real estate group b in Pittsburg, an area that is also currently in the early stages of development as a new residential neighborhood. AT&T reached out via U.S. Mail to initiate discussions but received confirmation. AT&T followed up after receiving no response but continued to receive a lack of interest from the landowners. This candidate is not feasible.

3. **PG&E Candidate – Tomales Bay Rd. APN 093-470-028.**



AT&T assessed a PG&E site as a potential candidate due to its zoning as Open Space (OS). This undeveloped land accommodates PG&E electrical towers and was selected by AT&T in 2023. However, during the initial efforts to secure interest, the landowner expressed unwillingness to participate in granting easements for site access. Furthermore, the required easement area falls under federal ownership, adding complexity to communication and delaying response times. This candidate is not feasible.

Universal Licensing System

ULS License

Cellular License - KNKN308 - AT&T Mobility Spectrum, LLC

This license has pending applications: 0010538588

Call Sign	KNKN308	Radio Service	CL - Cellular
Status	Active	Auth Type	Regular

Market

Market	CMA527 - Montana 5 - Mineral	Channel Block	A (View Frequencies)
Submarket	0	Phase	2

Dates

Grant	10/20/2020	Expiration	10/01/2030
Effective	01/24/2024	Cancellation	

Five Year Buildout Date

03/26/1996

ECIP Information

ECIP Flag

Small Carrier or Tribal Nation Transaction	Rural-Focused Transaction

ECIP Dates

5-Year Holding Period Begins	5-Year Holding Period Ends

Required Operational Filing Dates

IORN Operation Begin Date	FORN Deadline Date	FORN Filed Date

Control Points

1	18 W. GRANITE, BUTTE, MT
2	2000 COBURN ROAD, BILLINGS, MT

Licensee

FRN	0014980726 (View Ownership Filing)	Type	Limited Liability Company

Licensee

AT&T Mobility Spectrum, LLC
208 S Akard St, 20F

P:(855)699-7073
F:(214)746-6410

Dallas, TX 75202
ATTN National Regulatory Compliance
E:FCCMW@att.com

Contact

AT&T Services, Inc.
Jessica J Dunk
208 S Akard St, 20F
Dallas, TX 75202
ATTN NRC
P:(855)699-7073
F:(214)746-6410
E:FCCMW@att.com

Ownership and Qualifications

Radio Service Type	Mobile		
Regulatory Status	Common Carrier	Interconnected	Yes

Alien Ownership
The Applicant answered "No" to each of the Alien Ownership questions.

Basic Qualifications
The Applicant answered "No" to each of the Basic Qualification questions.

Demographics

Race

Ethnicity

Gender

LETTER OF AUTHORIZATION

To: City of Pittsburg Community Development Department

Subject: Application for Constructing a Telecommunications Facility

Property: 107 Greenmeadow Circle, Pittsburg, CA 94565

West Coast Homebuilders, Inc. as property owner located at 107 Greenmeadow Circle, Pittsburg, California APN 096-320-068 ("Owner"), does hereby give this one-time authorization to New Cingular Wireless, PCS, LLC dba AT&T Mobility ("Tenant") and it's agents New Cingular Wireless, PCS, LLC c/o Complete Wireless Consulting to act as its agent for the limited purpose of applying for and obtaining from the City of Pittsburg any permit or other necessary governmental requirement to construct improvements to the property to be leased to them by Owner for the purpose of constructing, operating and maintaining a telecommunications facility. The improvements to the property shall be done in accordance with the plans dated January 23, 2025 (Sheets T-1.1 through E-1.1) entitled *AT&T Site Number: CCL05107, AT&T Site Name: OAK HILLS* prepared by Complete Wireless Consulting, Inc.. Owner understands that the application may be denied, modified or approved with conditions and that such condition or modifications must be complied with prior to building permit issuance. Any conditions or modifications will be binding on Tenant and will not be binding on Owner.

This authorization is for the plans and work referred to above. Any modifications to the above-referenced plans and/or any modifications or expansion to the work identified.in said plans requires the additional, subsequent prior written approval of Owner.

Signature of Property Owner or Representative

West Coast Homebuilders, Inc.
By: Douglas W. Messner, Authorized Agent
Printed Name of Property Owner or Representative

Date:

Owner Contact Information:

Phone: (925) 609-6200 (Attn: Douglas W. Messner)

Email: dmessner@spprop.com

Preferred method of communication: Email

SBA Communications Corporation
8051 Congress Avenue
Boca Raton, FL 33487-1307

T + 561.995.7670
F + 561.995.7626

sbasite.com

LETTER OF AUTHORIZATION

SBA Site ID: CA1AFEF-L, PITTSBURG-MARTINEZ #1 006/030 / Hunting

Property Located at: 38 Beechwood Court, Pittsburg, CA, 94565

THE CITY/COUNTY OF: Pittsburg / Contra Costa

APPLICATION FOR ZONING/USE/BUILDING PERMIT

This letter authorizes AT&T and its authorized agents to file for all necessary zoning, planning and building permits (local, state and federal) for the purposes of installing, operating and maintaining a telecommunications facility on the existing tower on the property referenced above on behalf of Pacific Gas & Electric Co.

All approval conditions that may be granted to AT&T in connection with above referenced facility relating to this specific application are the sole responsibility of AT&T.

Golden State Licensing, LLC

Donald Day

Executive VP, Site Leasing

Date: 2/04/2025

Design Review for a Wireless Telecommunications Facility
New Cingular Wireless PCS, LLC. (d/b/a AT&T)

Site Name: CCL05107 – Oak Hills
Site Address: 107 Green Meadow Circle, Pittsburg, CA 94565
APN: 093-320-065-5

March 26th, 2024

Applicant Agent:
Complete Wireless Consulting – Steve Proo
2009 V Street
Sacramento, CA 95818
916-838-6713
sproo@completewireless.net

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Applicable Regulations Wireless Facilities....11
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Exhibits

A. Site Plans
B. Appendix A - Radio Frequency
C. Coverage Maps
D. Alternative Sites Analysis
E. FCC License Approval
F. Letter of Authorization

General Information

Owner:	West Coast Home Builders, Inc. 4021 Port Chicago Highway, Concord, CA 94520
Tower Owner:	Pacific Gas & Electric Company 245 Market Street San Francisco, CA 94105
Site Address:	107 Greenmeadow Circle Pittsburg, CA 94565
Applicant:	New Cingular Wireless, PCS, LLC. 2009 V Street Sacramento, CA 95818
APN #:	093-320-068-5
Coordinates:	38.013735 -121.954716
Parcel Area:	2 Acres
Zoning:	PD – Planned Development
Request:	Design Review for a wireless telecommunications facility collocated onto an existing PG&E tower.
Project Agent:	Complete Wireless Consulting 2009 V Street Sacramento, CA 95818
Contact:	Steve Proo 916-838-6713 sproo@completewireless.net

Project Overview

Complete Wireless Consulting is submitting a Design Review application for the collocation of a new wireless telecommunications facility on behalf of New Cingular Wireless, PCS, LLC (d/b/a AT&T) and the property owner, West Coast Home Builders, Inc. This facility aims to address a significant gap in coverage and capacity for AT&T customers in the Pittsburg community and enhance coverage along Highway 4.

AT&T plans to collocate on an existing 94-foot PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8-foot fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas.

A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added. For equipment specifications, please refer to the site plans, Exhibit A.

West Coast Home Builders, Inc. owns the 2-acre parcel, which is accessible from Green meadow Circle via an existing gravel path to the PG&E towers. This proposed site is unmanned and requires no on-site personnel. Visitation to the site by a service technician for routine maintenance may occur up to once per month.

The proposed site is entirely self-monitored and connected directly to the central office, where sophisticated computers alert personnel to any equipment malfunction. Because the wireless facility is unmanned, there are no regular hours of operation and no impact on existing local traffic patterns. No water or sanitation services are required. The facility itself operates 24/7. Unless tower lighting is required by the Federal Aviation Administration (FAA), the only lighting on the facility will be shielded lights inside the lease area for safety.

The construction of the facility will comply with all local rules and regulations. The crew size will range from two to ten individuals. The construction phase of the project will last approximately two months and will not exceed acceptable noise levels.

Coverage Needs

AT&T constructs wireless communication facilities at carefully selected locations. The need for service was determined by market demand, coverage, capacity requirements for a specific geographic area, and the need to provide continuous coverage from one site to another. AT&T Radio Frequency (RF) Coverage Analysis is attached as Exhibit B.

The following factors are considered when identifying the need and location of a new wireless facility.

Coverage. An antenna site must be located where the radio frequency broadcasts provide adequate coverage within any significant coverage gap. The RF engineer must consider the coverage objectives for the site and the terrain in and around the area to be covered. Since radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas, placing an antenna site near the center of the desired coverage area is generally best. However, in some instances, the search ring may be located away from the center of the desired coverage area due to the existing coverage, the surrounding terrain, or other features that might affect the radio frequency broadcasts, like buildings or sources of electrical interference.

Capacity. Capacity refers to the technological limitation of a wireless communication facility to provide communication. Mobile phones and wireless devices transmit to and receive radio frequency signals from antennas at wireless communication facilities. Antennas can transmit and receive a finite amount of signal – the capacity. When capacity is reached, busy signals on phones result, and data transmission is lost. Monitoring of each wireless facility is continuous, and the data collected is analyzed for planning to prevent overloading. Projections based on the data allow AT&Ts to plan, design, permit, and construct new facilities or modify existing wireless communication facilities before reaching or exceeding capacity, which can result in a loss of coverage.

Clutter. AT&T's antennas must "clear the clutter" in the area. Trees, buildings, and other natural and built obstacles adversely affect the radio frequencies used in AT&T systems. Radio frequencies do not penetrate mountains, hills, rocks, or metal. Therefore, antennas must be installed above the "clutter" to provide high-quality communications services in the desired coverage areas. In addition, if the local code requires us to accommodate additional carriers on the structure, the structure must be even higher to allow the other carriers' antennas to clear the clutter.

Call Handoff. The antenna site must be located where the radio broadcasts from this site will allow seamless call handoff with adjacent sites. "Call handoff" is a feature of a wireless communications system that allows an ongoing telephone conversation to continue uninterrupted as the user travels from the coverage area of one antenna site into the coverage area of an adjacent antenna site. This requires coverage overlapping for a sufficient distance and time to support the handoff mechanism.

Quality of Service. Wireless communications users want to use their services where they live, work, commute, and play, including indoors. AT&T's coverage objectives include providing indoor coverage in areas with residences, businesses, and indoor recreational facilities.

Radio Frequencies Used by System. The designs of telecommunications systems will vary significantly based on the radio frequencies used by the carrier. If the carrier uses radio frequencies in the 850 to 950 MHz range, the radio signals will travel further and penetrate buildings better than the radio frequencies in the 1900 MHz band. Thus, AT&T needs more antennas in a given area to support technologies that use the 1900 M.

Current Coverage

To analyze network design, AT&T uses a proprietary Radio Frequency prediction tool to predict the signal strength and analyze our network design. The colors represent the Reference Signal Received Power (RSRP), which measures signal strength and quality.

Green: until -90 dBm. This signal threshold represents a level of service adequate for providing reliable coverage inside a building. It provides good indoor and outdoor service.

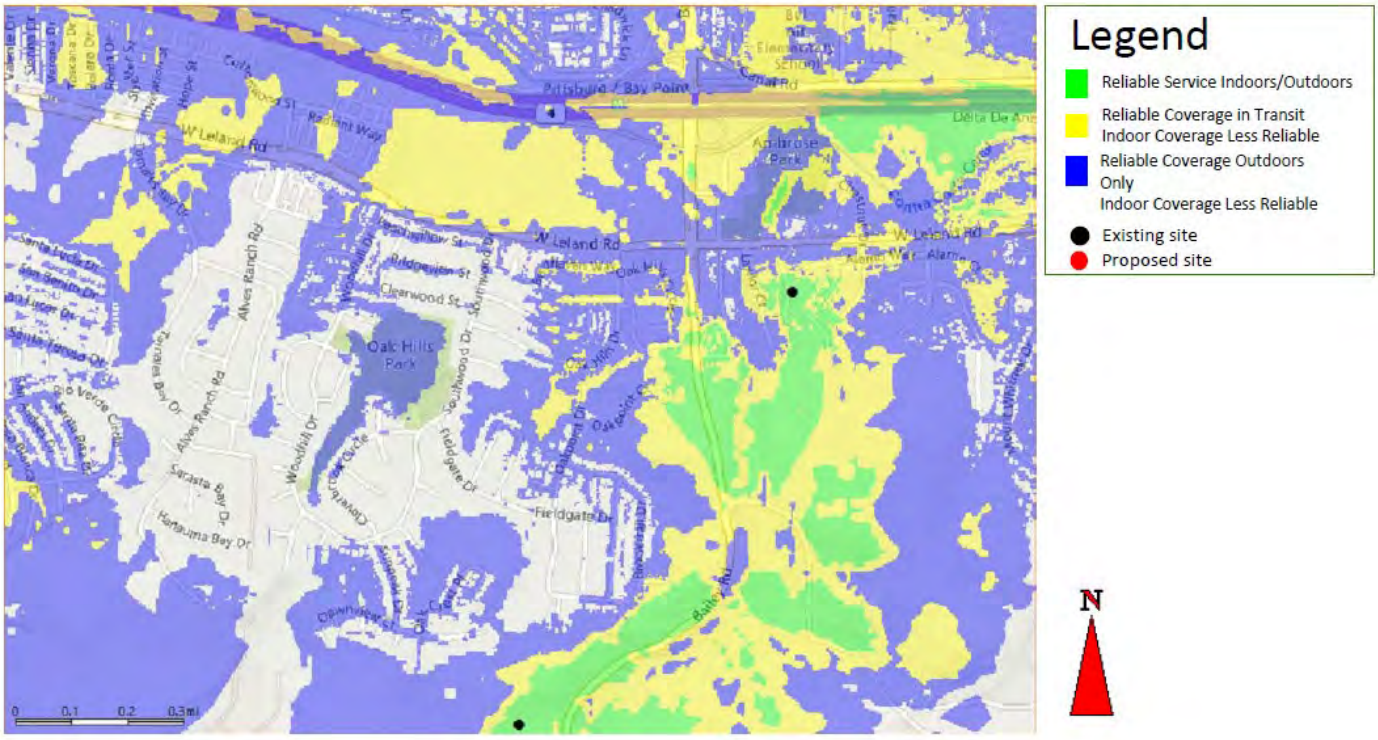
Yellow: until -100 dBm. This signal threshold represents a level of service adequate for providing reliable coverage outdoors or inside a car, but indoor or in-building coverage is unreliable. It provides good outdoor and in-car service but inadequate indoor service as QOS will be (or start getting) hampered.

Blue: until -113 dBm. This signal threshold represents a signal quality that is unreliable when making and/or holding a call. Terribly slow latency and data speeds. Both outdoor and indoor QOS will be unreliable.

The coverage plot shown below shows a significant coverage gap in this community of Pittsburg and large stretches of the Highway 4 corridor. A larger coverage map has been included with this application Exhibit C.

COMPLETE
Wireless Consulting, Inc.

Existing LTE 1900 RSRP



Site Selection

AT&T is seeking a site in this portion of Pittsburg to serve the Oak Hills community and Highway 4 corridor just west of Pittsburg Bart station. The following figure shows the general area AT&T radio frequency (RF) engineers identified to address the existing significant coverage gap.

The search area spans from two jurisdictions, City of Pittsburg and Concord. Initially, it covered a vacant area now being developed into a residential neighborhood. AT&T's goal is to extend coverage in this area, with a centerline height of 100-120 feet, adjustable based on the final location.

AT&T faced challenges with the original search ring (red outline), as large real estate developers owned it. Two rejected AT&T's proposals, and the other two did not respond, despite numerous attempts to outreach. Expanding the search ring westward did not help, as the new areas were still owned by the same developers (blue outline). AT&T Radio Frequency Engineers then directed us to a PG&E tower outside the original search ring to the north (green outline). Although accepted, the property was undeveloped, and the owner was not interested in providing easements. Additionally, the area was federally owned, complicating contact and response times. AT&T decided to pursue a neighboring PG&E tower, which already hosts other carriers and has open space.



The proposed location on Greenmeadow Circle was selected because it is separated by a 2-acre lot that currently houses two tall 90' PG&E lattice transformer towers which one currently have wireless antennas from another carrier. The facility will provide connecting coverage with other AT&T sites in the area that currently support the area that are currently over capacity and is causing the network to be 'stressed.'

Areas surrounding the third expanded search ring do not offer suitable tower placement as the neighborhood consists of residential homes that we would like to avoid yet serve as much as possible. This location has a large residential population of an estimated 3500 residents.

This PG&E collocation is the least intrusive option for addressing the existing significant coverage gap. The site has a well-maintained access road. For additional information, See Exhibit D, Alternative Sites Analysis

Proposed Site Location

Street View



Aerial View



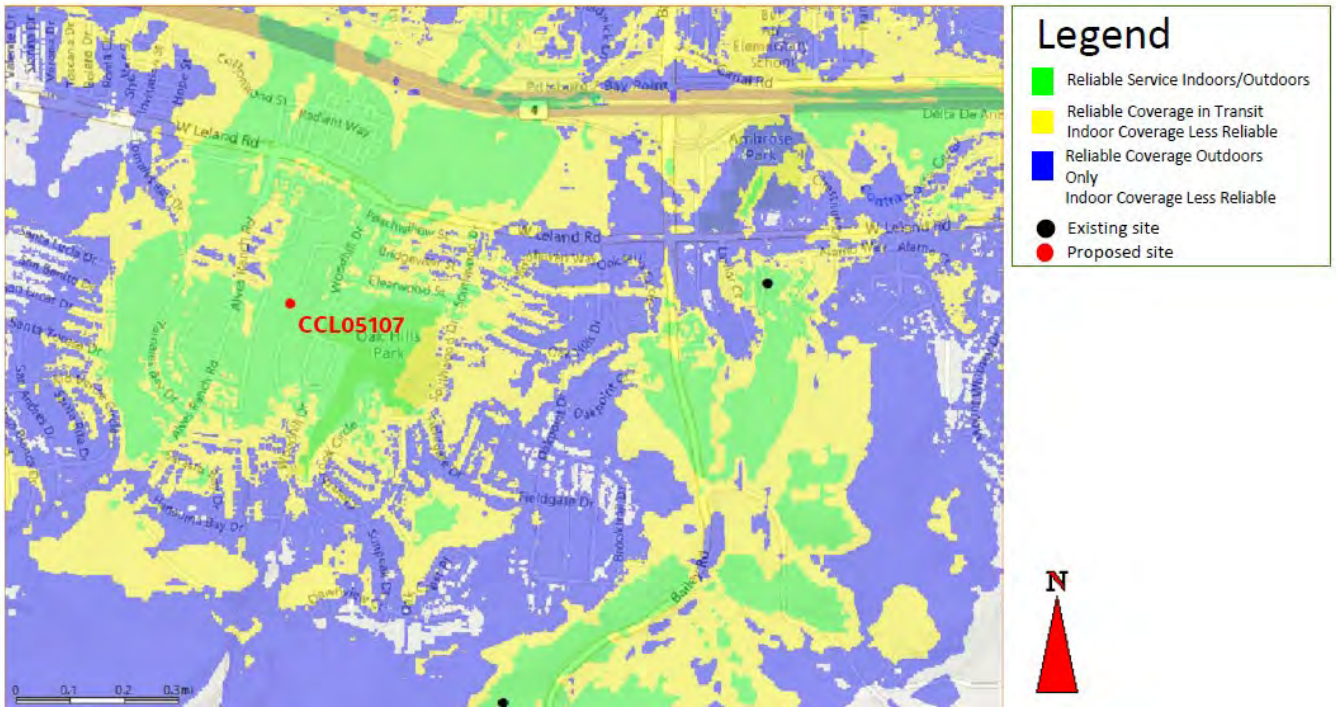
Equipment Lease Area



Projected Coverage

As shown in the provided coverage plot below, the proposed site will address an existing significant coverage gap in AT&T's regional wireless voice and data network. The proposed location will provide seamless coverage and communication with other AT&T towers nearby. This integrated network helps maintain consistent service quality for users in the region. Larger portions of the coverage maps have been included in this application, Exhibit C.

Proposed LTE 1900 RSRP with CCL05107



Applicable Regulations

The proposal is subject to the provisions of the City of Pittsburg land use regulations, including regulations for wireless facilities (Article 20 of the Zoning code, beginning at Sec. 18.84.925) and Design Review requirements (Article 3, beginning at Sec.18.36.210).

Article 20 Wireless Telecommunication Facilities

Sec.18.84.925 Application Requirements

1. A fully dimensioned site plan, plans, and elevations drawn to scale, prepared by a California-licensed engineer or architect showing any existing wireless facilities with all existing transmission equipment and other improvements, the proposed facility with all proposed transmission equipment and other improvements and the legal boundaries of the leased or owned area surrounding the proposed facility and any associated access or utility easements. The site plans must include descriptions and physical dimensions for all existing transmission equipment, if any, and all proposed transmission equipment to be installed.

   Response: The applicant has included site plans with the above requirements. See Exhibit A

2. Visual impact demonstrations using photographic simulations of the proposed facility in context of the site as it would be seen from reasonable line-of-sight locations from residential areas, public rights-of-way, public parks, and/or other sites as deemed appropriate by the city planner, together with a map that shows the photo location of each view angle.

   Response: The applicant has provided some pictures of the facility. Pleas provide a notice of incomplete should the city like additional photos.

3. A written description of the proposed approach for screening or camouflaging all facilities from public view, including plans for installation and maintenance of landscaping, sample exterior materials and colors, and an explanation of the measures by which the proposed facility would be camouflaged or rendered not readily visible. Where any part of the proposed facility would be readily visible, the application shall include a written explanation as to why it cannot or would not appropriately be screened or camouflaged from public view.

   Response: AT&T proposes collocating on an existing 94' PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8' fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas. A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional

camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

4. The applicant must provide a list of all existing structures considered as alternatives to the proposed location, together with a general description of the site design considered at each location. The applicant must also provide a written explanation as to why the alternatives considered were unacceptable or infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. This explanation must include a meaningful comparative analysis and such technical information and other factual justification as are necessary to document the reasons why each alternative is unacceptable, infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. If an existing facility is listed among the alternatives, the applicant must specifically address why the modification of such wireless communication facility is not a viable option. When an applicant proposes a site in the public right-of-way, the initial alternative sites analysis required for a complete application may evaluate other potential locations and designs in the right-of-way.

   Response: The applicant has provided an Alternative Sites Analysis with this application. See Exhibit D.

5. Copies of, or a sworn statement by, an authorized representative that applicant holds all applicable licenses or other approvals required by the Federal Communications Commission (FCC), the California Public Utilities Commission (PUC), and any other agency of the federal or state government with authority to regulate wireless telecommunications facilities that are required in order for the applicant to construct the proposed facility, and that applicant is in compliance with all conditions imposed in conjunction with such licenses or approvals.

   Response: The applicant has provided an FCC confirmation form that AT&T is licensed. See Exhibit F.

6. A written statement that includes: (a) a description of the technical objectives to be achieved; (b) an annotated topographical map that identifies the targeted service area to be benefited; (c) the estimated number of potentially affected users in the targeted service area; and (d) full-color signal propagation maps with objective units of signal strength measurement that show the applicant's current service coverage levels from all adjacent sites without the proposed site, predicted service coverage levels from all adjacent sites with the proposed site, and predicted service coverage levels from the proposed site without all adjacent sites.

   Response: The applicant has provided a written explanation of the above requirements as part of this application. Please refer to pages 4-9, coverage needs along with current and proposed coverage maps. See Exhibit C for coverage maps.

7. A radio frequency (RF) report acceptable to the city prepared and certified by an RF engineer that certifies that the proposed facility, as well as any collocated facilities, will comply with applicable federal RF exposure standards and exposure limits. The RF report must include the actual frequency and power levels (in watts ERP) for all existing and proposed antennas at the site and exhibits that show the location and orientation of all transmitting antennas and the boundaries of areas with RF exposures in excess of the uncontrolled/general population limit (as that term is defined by the FCC) and also the boundaries of areas with RF exposures in excess of the controlled/occupational limit (as that term is defined by the FCC). Each such boundary shall be clearly marked and identified for every transmitting antenna at the project site.

   Response: The applicant has provided an Appendix A document (Exhibit B) with this application.

8. A fully completed and executed application form as required by the city, as may be amended or updated from time to time. The applicant must state the approval it seeks (i.e., design review or minor modification pursuant to Section 6409(a))

   Response: The applicant is submitting a Design Review application for collocation to an existing structure for the addition of wireless antennas.

9. An application fee established by the city, as may be amended or updated from time to time.

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10. A cash or other sufficient deposit tendered by the applicant to the city for any third-party peer review determined by the city to be necessary to ensure compliance with the requirements of this article.

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Article 3: Design Review in Land Use in Land Use Districts Other Than Single Family Residential.

Sec.18.36.210(A-G) Required information for application under PMC 18.36.200.

A. Site plan showing:

1. General location of property; 2. Property boundaries; 3. Existing topography and proposed grading (for property no less than 10 acres, a contour interval no greater than five feet and a horizontal map scale of one inch equals 50 feet or larger shall be used; for property larger than 10 acres, a contour interval no greater than 10 feet and a horizontal map scale of one inch equals 100 feet or larger shall be used); 4. All existing and proposed structures, the height of each structure and number of dwelling units in each structure; 5. All existing and proposed signs; 6. Location and approximate height of all adjacent structures on abutting sites; 7. Location, dimensions and quantity of existing and proposed off-street parking, with a statement indicating whether it conforms to applicable regulations; 8. Existing and proposed vehicular and pedestrian ways, and trails, with grades, widths and types of improvements; 9. Proposed vehicular access between site and public street; 10. Locations, names and widths of abutting streets; 11. Existing and proposed utilities; 12. Existing and proposed recreational facilities; 13. Existing and proposed storm drainage facilities; 14. Location of existing trees on the site;15. Locations and heights of existing and proposed retaining walls; 16. Locations and dimensions of trash disposal areas;17. Roof overhangs; 18. Distances between buildings and from building walls to property lines; 19. Proposed street names; 20. Handicap facilities;

B. Architectural drawings showing:

1. Floor plans at one-eighth inch or one-quarter inch equals one foot zero inches.
2. Four elevations (or more if necessary) to include all sides of development at no less than one-eighth inch equals one foot zero inches.

Response: The applicant has included all applicable information in the site plans. See Exhibit A.

C. Landscaping plan, including plant names and sizes, and an irrigation plan.

Response: Due to the industrial design of the PG&E tower, additional camouflage is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

D. A recent photograph of the site itself and of adjacent properties showing the current condition of the properties.

Response: The applicant has provided photo simulations of the project.

E. Color and texture chips of actual samples of materials.

Response: Due to the industrial design of the PG&E tower, the applicant asks for a color sample to be waived.

F. Additional information which may be requested by the planning commission including but not limited to the following:

1. Recent photographs of sight line profiles in sufficiently large scale, taken from commonly used vantage points in the city (shopping centers, road intersections, scenic lookouts, etc.) with the outline of the proposed structure in proper scale and perspective superimposed on it.

2. Architectural drawings showing the locations, size, color, shape, and type of illumination of each proposed sign.

G. Other information as determined by the city planner. [Ord. 07-1284 § 3 (Exh. C), 2007; Ord. 979 § 2 (Exh. A), 1990.]

Response to F & G: The applicant respectfully requests that any additional items or information required by the planning commission or city planner be communicated through a Notice of Incomplete (NOI) in accordance with the FCC 90-day shot clock as outlined in the Spectrum Act. This will ensure timely and efficient processing of the application.

Notice of Actions Affecting This Design Review Permit

In accordance with California Government Code Section 65945(a), The applicant requests notice of any proposal to adopt or amend the: general plan, specific plan, zoning ordinance, ordinance(s) affecting building or grading permits that would in any manner affect this development permit. Any such notice may be sent to 2009 V Street, Sacramento, CA 95818. Attn: Steve Proo.

Thank you,

Steve Proo
Planning Specialist – Land Use Development
Complete Wireless Consulting
sproo@completewireless.net
Cell – 916-838-6713

Design Review for a Wireless Telecommunications Facility
New Cingular Wireless PCS, LLC. (d/b/a AT&T)

Site Name: CCL05107 – Oak Hills
Site Address: 107 Green Meadow Circle, Pittsburg, CA 94565
APN: 093-320-065-5

March 26th, 2024

Applicant Agent:
Complete Wireless Consulting – Steve Proo
2009 V Street
Sacramento, CA 95818
916-838-6713
sproo@completewireless.net

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Exhibits

A. Site Plans
B. Appendix A - Radio Frequency
C. Coverage Maps
D. Alternative Sites Analysis
E. FCC License Approval
F. Letter of Authorization

General Information

Owner:	West Coast Home Builders, Inc. 4021 Port Chicago Highway, Concord, CA 94520
Tower Owner:	Pacific Gas & Electric Company 245 Market Street San Francisco, CA 94105
Site Address:	107 Greenmeadow Circle Pittsburg, CA 94565
Applicant:	New Cingular Wireless, PCS, LLC. 2009 V Street Sacramento, CA 95818
APN #:	093-320-068-5
Coordinates:	38.013735 -121.954716
Parcel Area:	2 Acres
Zoning:	PD – Planned Development
Request:	Design Review for a wireless telecommunications facility collocated onto an existing PG&E tower.
Project Agent:	Complete Wireless Consulting 2009 V Street Sacramento, CA 95818
Contact:	Steve Proo 916-838-6713 sproo@completewireless.net

Project Overview

Complete Wireless Consulting is submitting a Design Review application for the collocation of a new wireless telecommunications facility on behalf of New Cingular Wireless, PCS, LLC (d/b/a AT&T) and the property owner, West Coast Home Builders, Inc. This facility aims to address a significant gap in coverage and capacity for AT&T customers in the Pittsburg community and enhance coverage along Highway 4.

AT&T plans to collocate on an existing 94-foot PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8-foot fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas.

A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added. For equipment specifications, please refer to the site plans, Exhibit A.

West Coast Home Builders, Inc. owns the 2-acre parcel, which is accessible from Green meadow Circle via an existing gravel path to the PG&E towers. This proposed site is unmanned and requires no on-site personnel. Visitation to the site by a service technician for routine maintenance may occur up to once per month.

The proposed site is entirely self-monitored and connected directly to the central office, where sophisticated computers alert personnel to any equipment malfunction. Because the wireless facility is unmanned, there are no regular hours of operation and no impact on existing local traffic patterns. No water or sanitation services are required. The facility itself operates 24/7. Unless tower lighting is required by the Federal Aviation Administration (FAA), the only lighting on the facility will be shielded lights inside the lease area for safety.

The construction of the facility will comply with all local rules and regulations. The crew size will range from two to ten individuals. The construction phase of the project will last approximately two months and will not exceed acceptable noise levels.

Coverage Needs

AT&T constructs wireless communication facilities at carefully selected locations. The need for service was determined by market demand, coverage, capacity requirements for a specific geographic area, and the need to provide continuous coverage from one site to another. AT&T Radio Frequency (RF) Coverage Analysis is attached as Exhibit B.

The following factors are considered when identifying the need and location of a new wireless facility.

Coverage. An antenna site must be located where the radio frequency broadcasts provide adequate coverage within any significant coverage gap. The RF engineer must consider the coverage objectives for the site and the terrain in and around the area to be covered. Since radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas, placing an antenna site near the center of the desired coverage area is generally best. However, in some instances, the search ring may be located away from the center of the desired coverage area due to the existing coverage, the surrounding terrain, or other features that might affect the radio frequency broadcasts, like buildings or sources of electrical interference.

Capacity. Capacity refers to the technological limitation of a wireless communication facility to provide communication. Mobile phones and wireless devices transmit to and receive radio frequency signals from antennas at wireless communication facilities. Antennas can transmit and receive a finite amount of signal – the capacity. When capacity is reached, busy signals on phones result, and data transmission is lost. Monitoring of each wireless facility is continuous, and the data collected is analyzed for planning to prevent overloading. Projections based on the data allow AT&Ts to plan, design, permit, and construct new facilities or modify existing wireless communication facilities before reaching or exceeding capacity, which can result in a loss of coverage.

Clutter. AT&T's antennas must "clear the clutter" in the area. Trees, buildings, and other natural and built obstacles adversely affect the radio frequencies used in AT&T systems. Radio frequencies do not penetrate mountains, hills, rocks, or metal. Therefore, antennas must be installed above the "clutter" to provide high-quality communications services in the desired coverage areas. In addition, if the local code requires us to accommodate additional carriers on the structure, the structure must be even higher to allow the other carriers' antennas to clear the clutter.

Call Handoff. The antenna site must be located where the radio broadcasts from this site will allow seamless call handoff with adjacent sites. "Call handoff" is a feature of a wireless communications system that allows an ongoing telephone conversation to continue uninterrupted as the user travels from the coverage area of one antenna site into the coverage area of an adjacent antenna site. This requires coverage overlapping for a sufficient distance and time to support the handoff mechanism.

Quality of Service. Wireless communications users want to use their services where they live, work, commute, and play, including indoors. AT&T's coverage objectives include providing indoor coverage in areas with residences, businesses, and indoor recreational facilities.

Radio Frequencies Used by System. The designs of telecommunications systems will vary significantly based on the radio frequencies used by the carrier. If the carrier uses radio frequencies in the 850 to 950 MHz range, the radio signals will travel further and penetrate buildings better than the radio frequencies in the 1900 MHz band. Thus, AT&T needs more antennas in a given area to support technologies that use the 1900 M.

Current Coverage

To analyze network design, AT&T uses a proprietary Radio Frequency prediction tool to predict the signal strength and analyze our network design. The colors represent the Reference Signal Received Power (RSRP), which measures signal strength and quality.

Green: until -90 dBm. This signal threshold represents a level of service adequate for providing reliable coverage inside a building. It provides good indoor and outdoor service.

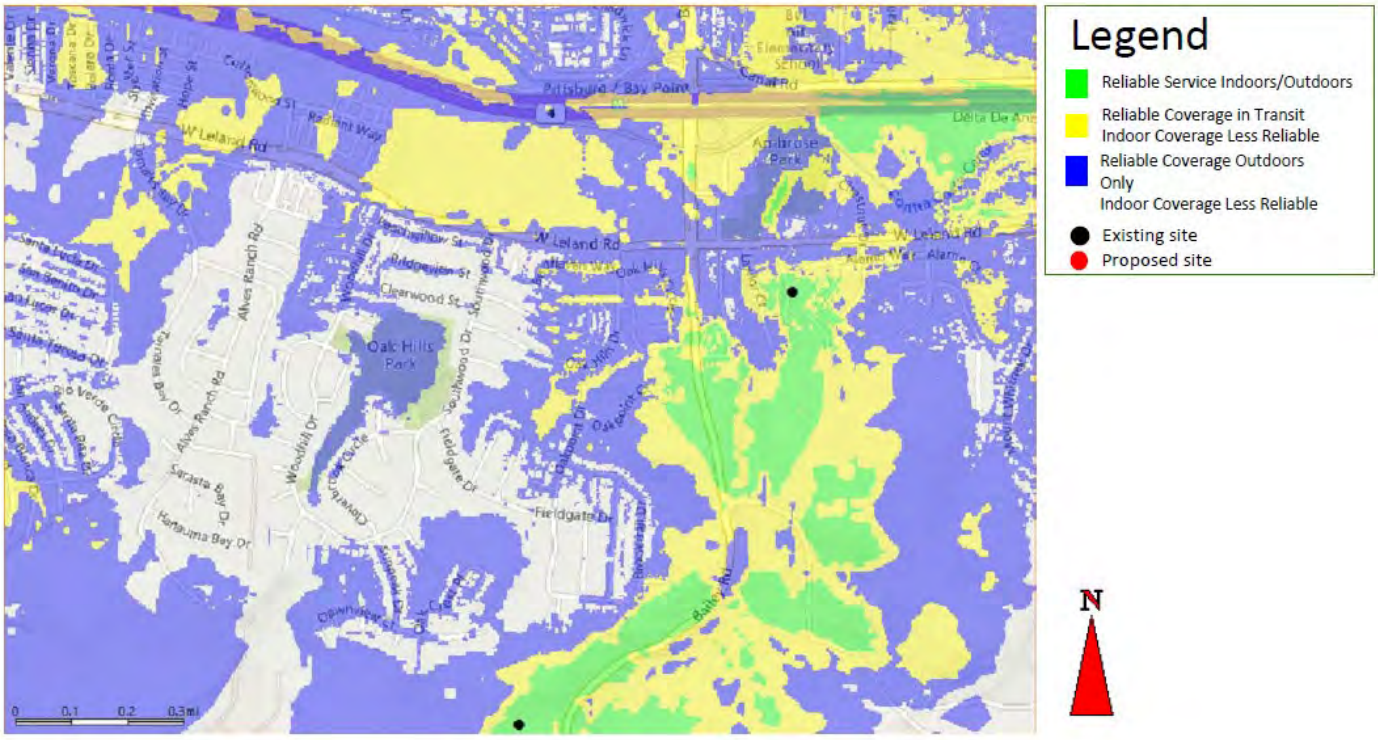
Yellow: until -100 dBm. This signal threshold represents a level of service adequate for providing reliable coverage outdoors or inside a car, but indoor or in-building coverage is unreliable. It provides good outdoor and in-car service but inadequate indoor service as QOS will be (or start getting) hampered.

Blue: until -113 dBm. This signal threshold represents a signal quality that is unreliable when making and/or holding a call. Terribly slow latency and data speeds. Both outdoor and indoor QOS will be unreliable.

The coverage plot shown below shows a significant coverage gap in this community of Pittsburg and large stretches of the Highway 4 corridor. A larger coverage map has been included with this application Exhibit C.

COMPLETE
Wireless Consulting, Inc.

Existing LTE 1900 RSRP



Site Selection

AT&T is seeking a site in this portion of Pittsburg to serve the Oak Hills community and Highway 4 corridor just west of Pittsburg Bart station. The following figure shows the general area AT&T radio frequency (RF) engineers identified to address the existing significant coverage gap.

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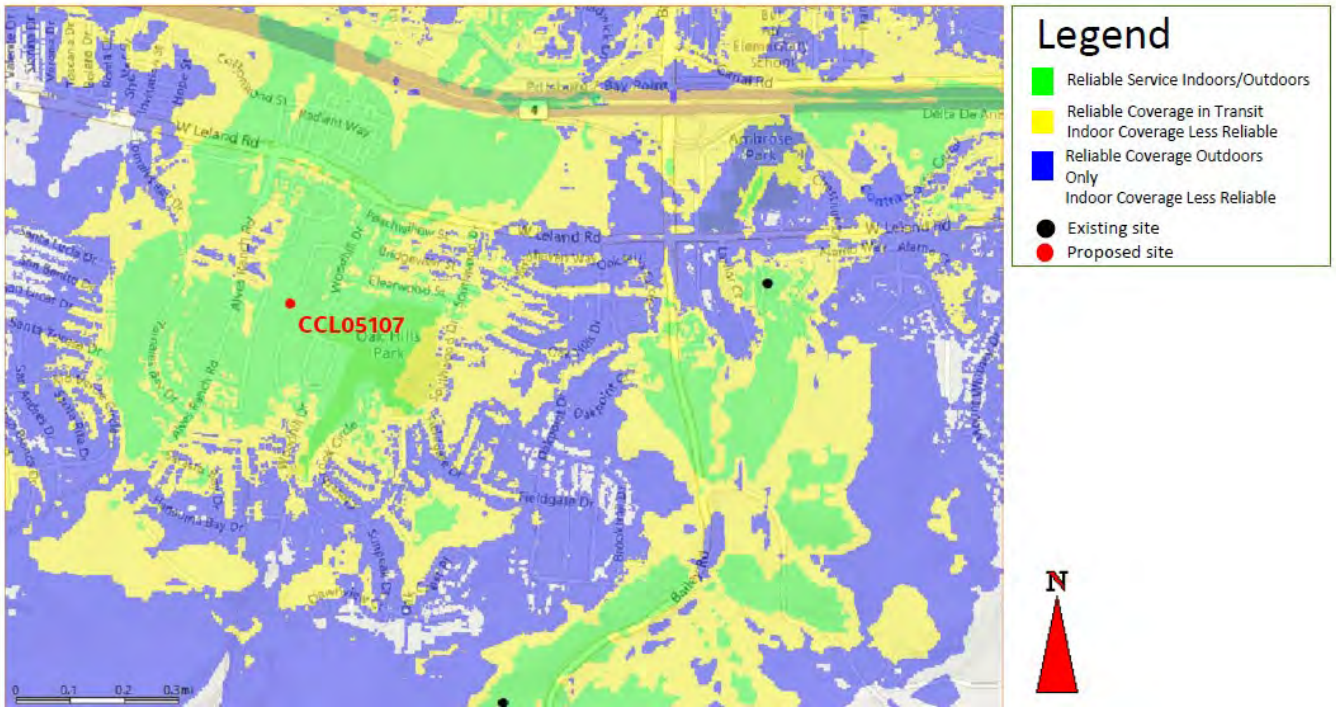
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Proposed LTE 1900 RSRP with CCL05107



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2. Architectural drawings showing the locations, size, color, shape, and type of illumination of each proposed sign.

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Response to F & G: The applicant respectfully requests that any additional items or information required by the planning commission or city planner be communicated through a Notice of Incomplete (NOI) in accordance with the FCC 90-day shot clock as outlined in the Spectrum Act. This will ensure timely and efficient processing of the application.

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Thank you,

Steve Proo
Planning Specialist – Land Use Development
Complete Wireless Consulting
sproo@completewireless.net
Cell – 916-838-6713

Design Review for a Wireless Telecommunications Facility
New Cingular Wireless PCS, LLC. (d/b/a AT&T)

Site Name: CCL05107 – Oak Hills
Site Address: 107 Green Meadow Circle, Pittsburg, CA 94565
APN: 093-320-065-5

March 26th, 2024

Applicant Agent:
Complete Wireless Consulting – Steve Proo
2009 V Street
Sacramento, CA 95818
916-838-6713
sproo@completewireless.net

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Exhibits

A. Site Plans
B. Appendix A - Radio Frequency
C. Coverage Maps
D. Alternative Sites Analysis
E. FCC License Approval
F. Letter of Authorization

General Information

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Tower Owner:	Pacific Gas & Electric Company 245 Market Street San Francisco, CA 94105
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Applicant:	New Cingular Wireless, PCS, LLC. 2009 V Street Sacramento, CA 95818
APN #:	093-320-068-5
Coordinates:	38.013735 -121.954716
Parcel Area:	2 Acres
Zoning:	PD – Planned Development
Request:	Design Review for a wireless telecommunications facility collocated onto an existing PG&E tower.
Project Agent:	Complete Wireless Consulting 2009 V Street Sacramento, CA 95818
Contact:	Steve Proo 916-838-6713 sproo@completewireless.net

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Complete Wireless Consulting is submitting a Design Review application for the collocation of a new wireless telecommunications facility on behalf of New Cingular Wireless, PCS, LLC (d/b/a AT&T) and the property owner, West Coast Home Builders, Inc. This facility aims to address a significant gap in coverage and capacity for AT&T customers in the Pittsburg community and enhance coverage along Highway 4.

AT&T plans to collocate on an existing 94-foot PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8-foot fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas.

A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added. For equipment specifications, please refer to the site plans, Exhibit A.

West Coast Home Builders, Inc. owns the 2-acre parcel, which is accessible from Green meadow Circle via an existing gravel path to the PG&E towers. This proposed site is unmanned and requires no on-site personnel. Visitation to the site by a service technician for routine maintenance may occur up to once per month.

The proposed site is entirely self-monitored and connected directly to the central office, where sophisticated computers alert personnel to any equipment malfunction. Because the wireless facility is unmanned, there are no regular hours of operation and no impact on existing local traffic patterns. No water or sanitation services are required. The facility itself operates 24/7. Unless tower lighting is required by the Federal Aviation Administration (FAA), the only lighting on the facility will be shielded lights inside the lease area for safety.

The construction of the facility will comply with all local rules and regulations. The crew size will range from two to ten individuals. The construction phase of the project will last approximately two months and will not exceed acceptable noise levels.

Coverage Needs

AT&T constructs wireless communication facilities at carefully selected locations. The need for service was determined by market demand, coverage, capacity requirements for a specific geographic area, and the need to provide continuous coverage from one site to another. AT&T Radio Frequency (RF) Coverage Analysis is attached as Exhibit B.

The following factors are considered when identifying the need and location of a new wireless facility.

Coverage. An antenna site must be located where the radio frequency broadcasts provide adequate coverage within any significant coverage gap. The RF engineer must consider the coverage objectives for the site and the terrain in and around the area to be covered. Since radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas, placing an antenna site near the center of the desired coverage area is generally best. However, in some instances, the search ring may be located away from the center of the desired coverage area due to the existing coverage, the surrounding terrain, or other features that might affect the radio frequency broadcasts, like buildings or sources of electrical interference.

Capacity. Capacity refers to the technological limitation of a wireless communication facility to provide communication. Mobile phones and wireless devices transmit to and receive radio frequency signals from antennas at wireless communication facilities. Antennas can transmit and receive a finite amount of signal – the capacity. When capacity is reached, busy signals on phones result, and data transmission is lost. Monitoring of each wireless facility is continuous, and the data collected is analyzed for planning to prevent overloading. Projections based on the data allow AT&Ts to plan, design, permit, and construct new facilities or modify existing wireless communication facilities before reaching or exceeding capacity, which can result in a loss of coverage.

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To analyze network design, AT&T uses a proprietary Radio Frequency prediction tool to predict the signal strength and analyze our network design. The colors represent the Reference Signal Received Power (RSRP), which measures signal strength and quality.

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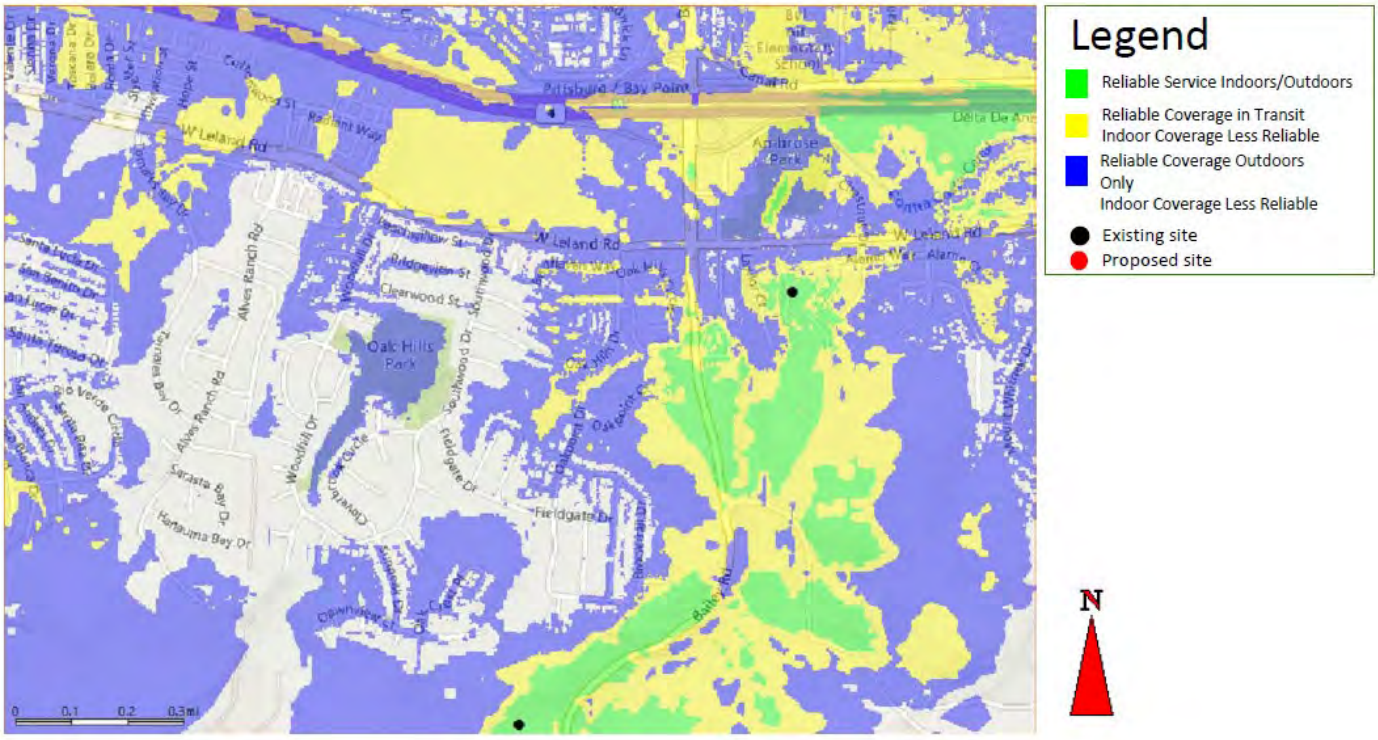
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The coverage plot shown below shows a significant coverage gap in this community of Pittsburg and large stretches of the Highway 4 corridor. A larger coverage map has been included with this application Exhibit C.

COMPLETE
Wireless Consulting, Inc.

Existing LTE 1900 RSRP



Site Selection

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The search area spans from two jurisdictions, City of Pittsburg and Concord. Initially, it covered a vacant area now being developed into a residential neighborhood. AT&T's goal is to extend coverage in this area, with a centerline height of 100-120 feet, adjustable based on the final location.

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The proposed location on Greenmeadow Circle was selected because it is separated by a 2-acre lot that currently houses two tall 90' PG&E lattice transformer towers which one currently have wireless antennas from another carrier. The facility will provide connecting coverage with other AT&T sites in the area that currently support the area that are currently over capacity and is causing the network to be 'stressed.'

Areas surrounding the third expanded search ring do not offer suitable tower placement as the neighborhood consists of residential homes that we would like to avoid yet serve as much as possible. This location has a large residential population of an estimated 3500 residents.

This PG&E collocation is the least intrusive option for addressing the existing significant coverage gap. The site has a well-maintained access road. For additional information, See Exhibit D, Alternative Sites Analysis

Proposed Site Location

Street View



Aerial View



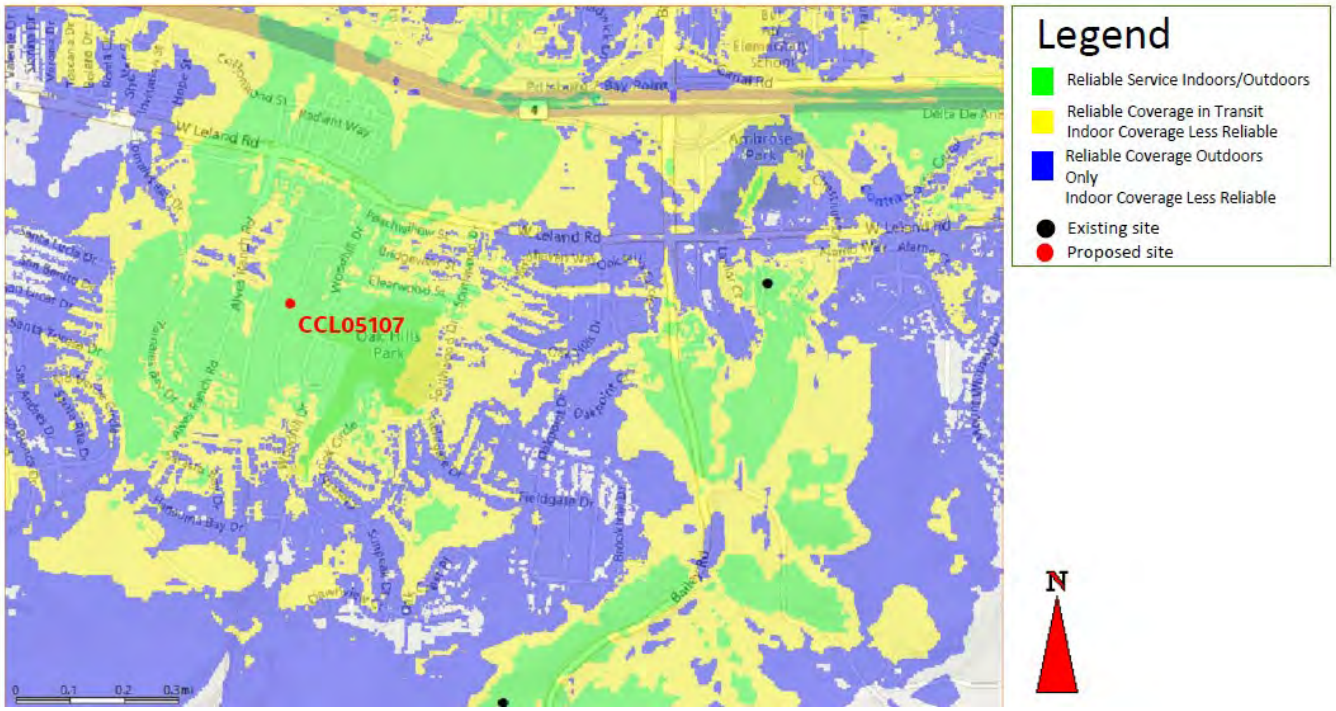
Equipment Lease Area



Projected Coverage

As shown in the provided coverage plot below, the proposed site will address an existing significant coverage gap in AT&T's regional wireless voice and data network. The proposed location will provide seamless coverage and communication with other AT&T towers nearby. This integrated network helps maintain consistent service quality for users in the region. Larger portions of the coverage maps have been included in this application, Exhibit C.

Proposed LTE 1900 RSRP with CCL05107



Applicable Regulations

The proposal is subject to the provisions of the City of Pittsburg land use regulations, including regulations for wireless facilities (Article 20 of the Zoning code, beginning at Sec. 18.84.925) and Design Review requirements (Article 3, beginning at Sec.18.36.210).

Article 20 Wireless Telecommunication Facilities

Sec.18.84.925 Application Requirements

1. A fully dimensioned site plan, plans, and elevations drawn to scale, prepared by a California-licensed engineer or architect showing any existing wireless facilities with all existing transmission equipment and other improvements, the proposed facility with all proposed transmission equipment and other improvements and the legal boundaries of the leased or owned area surrounding the proposed facility and any associated access or utility easements. The site plans must include descriptions and physical dimensions for all existing transmission equipment, if any, and all proposed transmission equipment to be installed.

   Response: The applicant has included site plans with the above requirements. See Exhibit A

2. Visual impact demonstrations using photographic simulations of the proposed facility in context of the site as it would be seen from reasonable line-of-sight locations from residential areas, public rights-of-way, public parks, and/or other sites as deemed appropriate by the city planner, together with a map that shows the photo location of each view angle.

   Response: The applicant has provided some pictures of the facility. Pleas provide a notice of incomplete should the city like additional photos.

3. A written description of the proposed approach for screening or camouflaging all facilities from public view, including plans for installation and maintenance of landscaping, sample exterior materials and colors, and an explanation of the measures by which the proposed facility would be camouflaged or rendered not readily visible. Where any part of the proposed facility would be readily visible, the application shall include a written explanation as to why it cannot or would not appropriately be screened or camouflaged from public view.

   Response: AT&T proposes collocating on an existing 94' PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8' fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas. A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional

camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

4. The applicant must provide a list of all existing structures considered as alternatives to the proposed location, together with a general description of the site design considered at each location. The applicant must also provide a written explanation as to why the alternatives considered were unacceptable or infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. This explanation must include a meaningful comparative analysis and such technical information and other factual justification as are necessary to document the reasons why each alternative is unacceptable, infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. If an existing facility is listed among the alternatives, the applicant must specifically address why the modification of such wireless communication facility is not a viable option. When an applicant proposes a site in the public right-of-way, the initial alternative sites analysis required for a complete application may evaluate other potential locations and designs in the right-of-way.

   Response: The applicant has provided an Alternative Sites Analysis with this application. See Exhibit D.

5. Copies of, or a sworn statement by, an authorized representative that applicant holds all applicable licenses or other approvals required by the Federal Communications Commission (FCC), the California Public Utilities Commission (PUC), and any other agency of the federal or state government with authority to regulate wireless telecommunications facilities that are required in order for the applicant to construct the proposed facility, and that applicant is in compliance with all conditions imposed in conjunction with such licenses or approvals.

   Response: The applicant has provided an FCC confirmation form that AT&T is licensed. See Exhibit F.

6. A written statement that includes: (a) a description of the technical objectives to be achieved; (b) an annotated topographical map that identifies the targeted service area to be benefited; (c) the estimated number of potentially affected users in the targeted service area; and (d) full-color signal propagation maps with objective units of signal strength measurement that show the applicant's current service coverage levels from all adjacent sites without the proposed site, predicted service coverage levels from all adjacent sites with the proposed site, and predicted service coverage levels from the proposed site without all adjacent sites.

   Response: The applicant has provided a written explanation of the above requirements as part of this application. Please refer to pages 4-9, coverage needs along with current and proposed coverage maps. See Exhibit C for coverage maps.

7. A radio frequency (RF) report acceptable to the city prepared and certified by an RF engineer that certifies that the proposed facility, as well as any collocated facilities, will comply with applicable federal RF exposure standards and exposure limits. The RF report must include the actual frequency and power levels (in watts ERP) for all existing and proposed antennas at the site and exhibits that show the location and orientation of all transmitting antennas and the boundaries of areas with RF exposures in excess of the uncontrolled/general population limit (as that term is defined by the FCC) and also the boundaries of areas with RF exposures in excess of the controlled/occupational limit (as that term is defined by the FCC). Each such boundary shall be clearly marked and identified for every transmitting antenna at the project site.

   Response: The applicant has provided an Appendix A document (Exhibit B) with this application.

8. A fully completed and executed application form as required by the city, as may be amended or updated from time to time. The applicant must state the approval it seeks (i.e., design review or minor modification pursuant to Section 6409(a))

   Response: The applicant is submitting a Design Review application for collocation to an existing structure for the addition of wireless antennas.

9. An application fee established by the city, as may be amended or updated from time to time.

   Response: The applicant is prepared to pay all fees associated with this Design Review Planning Application.

10. A cash or other sufficient deposit tendered by the applicant to the city for any third-party peer review determined by the city to be necessary to ensure compliance with the requirements of this article.

    Response: The applicant requests to be notified in writing if any additional studies are required. Furthermore, the applicant asks to be informed whether these studies will be conducted by the applicant or the City of Pittsburg before any study commences.

Article 3: Design Review in Land Use in Land Use Districts Other Than Single Family Residential.

Sec.18.36.210(A-G) Required information for application under PMC 18.36.200.

A. Site plan showing:

1. General location of property; 2. Property boundaries; 3. Existing topography and proposed grading (for property no less than 10 acres, a contour interval no greater than five feet and a horizontal map scale of one inch equals 50 feet or larger shall be used; for property larger than 10 acres, a contour interval no greater than 10 feet and a horizontal map scale of one inch equals 100 feet or larger shall be used); 4. All existing and proposed structures, the height of each structure and number of dwelling units in each structure; 5. All existing and proposed signs; 6. Location and approximate height of all adjacent structures on abutting sites; 7. Location, dimensions and quantity of existing and proposed off-street parking, with a statement indicating whether it conforms to applicable regulations; 8. Existing and proposed vehicular and pedestrian ways, and trails, with grades, widths and types of improvements; 9. Proposed vehicular access between site and public street; 10. Locations, names and widths of abutting streets; 11. Existing and proposed utilities; 12. Existing and proposed recreational facilities; 13. Existing and proposed storm drainage facilities; 14. Location of existing trees on the site;15. Locations and heights of existing and proposed retaining walls; 16. Locations and dimensions of trash disposal areas;17. Roof overhangs; 18. Distances between buildings and from building walls to property lines; 19. Proposed street names; 20. Handicap facilities;

B. Architectural drawings showing:

1. Floor plans at one-eighth inch or one-quarter inch equals one foot zero inches.
2. Four elevations (or more if necessary) to include all sides of development at no less than one-eighth inch equals one foot zero inches.

Response: The applicant has included all applicable information in the site plans. See Exhibit A.

C. Landscaping plan, including plant names and sizes, and an irrigation plan.

Response: Due to the industrial design of the PG&E tower, additional camouflage is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

D. A recent photograph of the site itself and of adjacent properties showing the current condition of the properties.

Response: The applicant has provided photo simulations of the project.

E. Color and texture chips of actual samples of materials.

Response: Due to the industrial design of the PG&E tower, the applicant asks for a color sample to be waived.

F. Additional information which may be requested by the planning commission including but not limited to the following:

1. Recent photographs of sight line profiles in sufficiently large scale, taken from commonly used vantage points in the city (shopping centers, road intersections, scenic lookouts, etc.) with the outline of the proposed structure in proper scale and perspective superimposed on it.

2. Architectural drawings showing the locations, size, color, shape, and type of illumination of each proposed sign.

G. Other information as determined by the city planner. [Ord. 07-1284 § 3 (Exh. C), 2007; Ord. 979 § 2 (Exh. A), 1990.]

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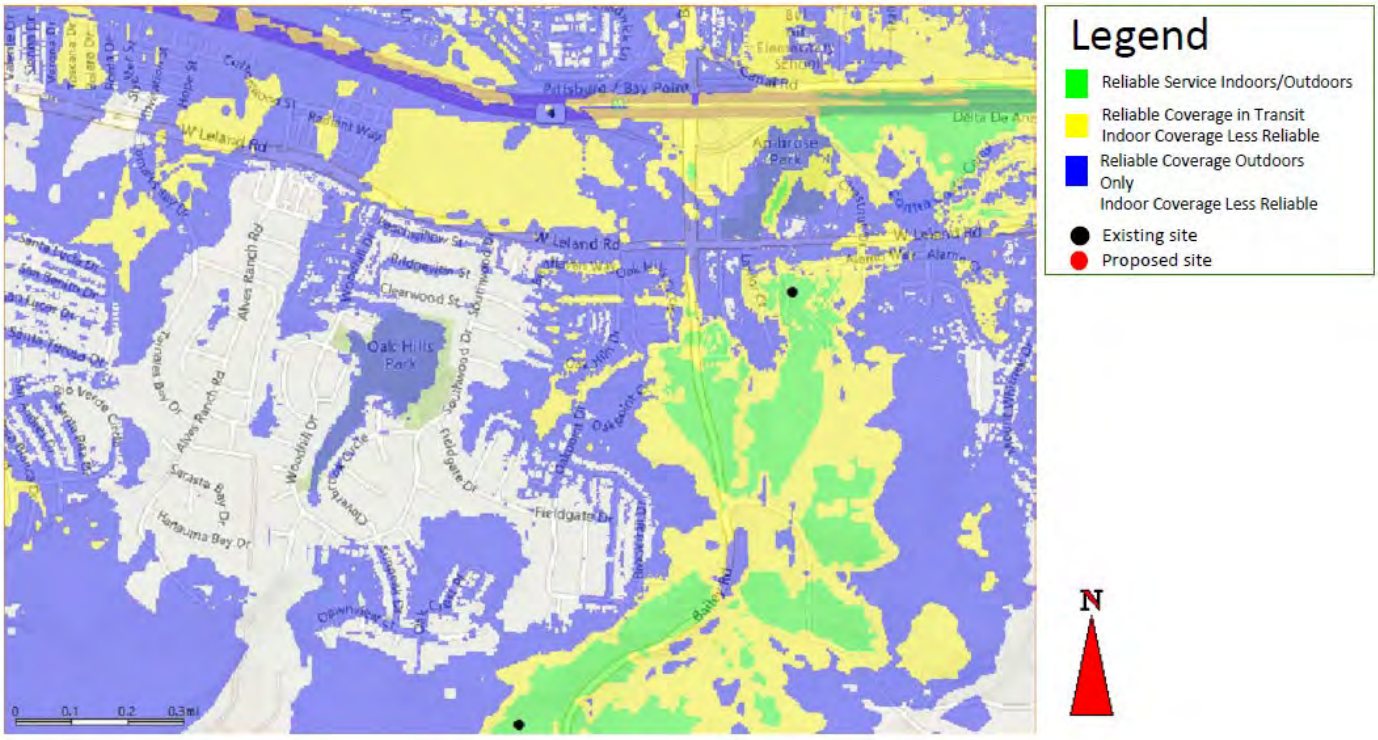
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COMPLETE
Wireless Consulting, Inc.

Existing LTE 1900 RSRP



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Aerial View



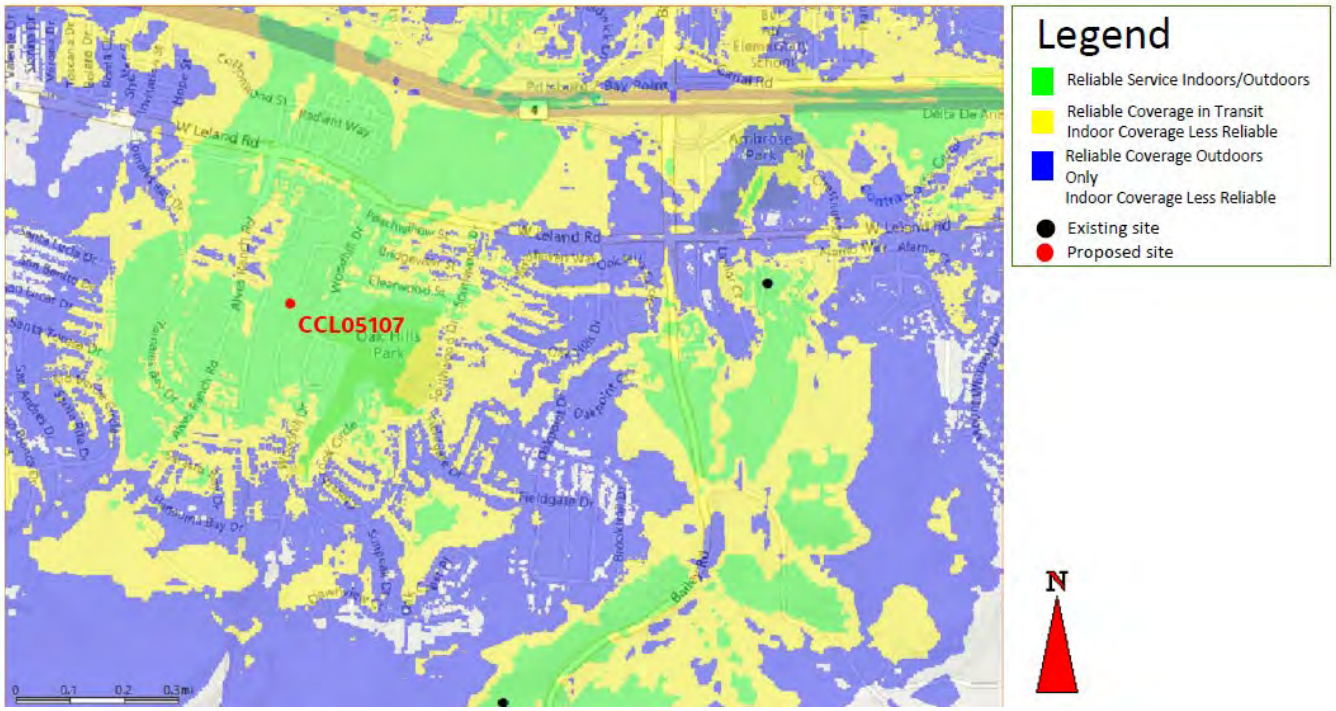
Equipment Lease Area



Projected Coverage

As shown in the provided coverage plot below, the proposed site will address an existing significant coverage gap in AT&T's regional wireless voice and data network. The proposed location will provide seamless coverage and communication with other AT&T towers nearby. This integrated network helps maintain consistent service quality for users in the region. Larger portions of the coverage maps have been included in this application, Exhibit C.

Proposed LTE 1900 RSRP with CCL05107



Applicable Regulations

The proposal is subject to the provisions of the City of Pittsburg land use regulations, including regulations for wireless facilities (Article 20 of the Zoning code, beginning at Sec. 18.84.925) and Design Review requirements (Article 3, beginning at Sec.18.36.210).

Article 20 Wireless Telecommunication Facilities

Sec.18.84.925 Application Requirements

1. A fully dimensioned site plan, plans, and elevations drawn to scale, prepared by a California-licensed engineer or architect showing any existing wireless facilities with all existing transmission equipment and other improvements, the proposed facility with all proposed transmission equipment and other improvements and the legal boundaries of the leased or owned area surrounding the proposed facility and any associated access or utility easements. The site plans must include descriptions and physical dimensions for all existing transmission equipment, if any, and all proposed transmission equipment to be installed.

   Response: The applicant has included site plans with the above requirements. See Exhibit A

2. Visual impact demonstrations using photographic simulations of the proposed facility in context of the site as it would be seen from reasonable line-of-sight locations from residential areas, public rights-of-way, public parks, and/or other sites as deemed appropriate by the city planner, together with a map that shows the photo location of each view angle.

   Response: The applicant has provided some pictures of the facility. Pleas provide a notice of incomplete should the city like additional photos.

3. A written description of the proposed approach for screening or camouflaging all facilities from public view, including plans for installation and maintenance of landscaping, sample exterior materials and colors, and an explanation of the measures by which the proposed facility would be camouflaged or rendered not readily visible. Where any part of the proposed facility would be readily visible, the application shall include a written explanation as to why it cannot or would not appropriately be screened or camouflaged from public view.

   Response: AT&T proposes collocating on an existing 94' PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8' fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas. A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional

camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

4. The applicant must provide a list of all existing structures considered as alternatives to the proposed location, together with a general description of the site design considered at each location. The applicant must also provide a written explanation as to why the alternatives considered were unacceptable or infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. This explanation must include a meaningful comparative analysis and such technical information and other factual justification as are necessary to document the reasons why each alternative is unacceptable, infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. If an existing facility is listed among the alternatives, the applicant must specifically address why the modification of such wireless communication facility is not a viable option. When an applicant proposes a site in the public right-of-way, the initial alternative sites analysis required for a complete application may evaluate other potential locations and designs in the right-of-way.

   Response: The applicant has provided an Alternative Sites Analysis with this application. See Exhibit D.

5. Copies of, or a sworn statement by, an authorized representative that applicant holds all applicable licenses or other approvals required by the Federal Communications Commission (FCC), the California Public Utilities Commission (PUC), and any other agency of the federal or state government with authority to regulate wireless telecommunications facilities that are required in order for the applicant to construct the proposed facility, and that applicant is in compliance with all conditions imposed in conjunction with such licenses or approvals.

   Response: The applicant has provided an FCC confirmation form that AT&T is licensed. See Exhibit F.

6. A written statement that includes: (a) a description of the technical objectives to be achieved; (b) an annotated topographical map that identifies the targeted service area to be benefited; (c) the estimated number of potentially affected users in the targeted service area; and (d) full-color signal propagation maps with objective units of signal strength measurement that show the applicant's current service coverage levels from all adjacent sites without the proposed site, predicted service coverage levels from all adjacent sites with the proposed site, and predicted service coverage levels from the proposed site without all adjacent sites.

   Response: The applicant has provided a written explanation of the above requirements as part of this application. Please refer to pages 4-9, coverage needs along with current and proposed coverage maps. See Exhibit C for coverage maps.

7. A radio frequency (RF) report acceptable to the city prepared and certified by an RF engineer that certifies that the proposed facility, as well as any collocated facilities, will comply with applicable federal RF exposure standards and exposure limits. The RF report must include the actual frequency and power levels (in watts ERP) for all existing and proposed antennas at the site and exhibits that show the location and orientation of all transmitting antennas and the boundaries of areas with RF exposures in excess of the uncontrolled/general population limit (as that term is defined by the FCC) and also the boundaries of areas with RF exposures in excess of the controlled/occupational limit (as that term is defined by the FCC). Each such boundary shall be clearly marked and identified for every transmitting antenna at the project site.

   Response: The applicant has provided an Appendix A document (Exhibit B) with this application.

8. A fully completed and executed application form as required by the city, as may be amended or updated from time to time. The applicant must state the approval it seeks (i.e., design review or minor modification pursuant to Section 6409(a))

   Response: The applicant is submitting a Design Review application for collocation to an existing structure for the addition of wireless antennas.

9. An application fee established by the city, as may be amended or updated from time to time.

   Response: The applicant is prepared to pay all fees associated with this Design Review Planning Application.

10. A cash or other sufficient deposit tendered by the applicant to the city for any third-party peer review determined by the city to be necessary to ensure compliance with the requirements of this article.

    Response: The applicant requests to be notified in writing if any additional studies are required. Furthermore, the applicant asks to be informed whether these studies will be conducted by the applicant or the City of Pittsburg before any study commences.

Article 3: Design Review in Land Use in Land Use Districts Other Than Single Family Residential.

Sec.18.36.210(A-G) Required information for application under PMC 18.36.200.

A. Site plan showing:

1. General location of property; 2. Property boundaries; 3. Existing topography and proposed grading (for property no less than 10 acres, a contour interval no greater than five feet and a horizontal map scale of one inch equals 50 feet or larger shall be used; for property larger than 10 acres, a contour interval no greater than 10 feet and a horizontal map scale of one inch equals 100 feet or larger shall be used); 4. All existing and proposed structures, the height of each structure and number of dwelling units in each structure; 5. All existing and proposed signs; 6. Location and approximate height of all adjacent structures on abutting sites; 7. Location, dimensions and quantity of existing and proposed off-street parking, with a statement indicating whether it conforms to applicable regulations; 8. Existing and proposed vehicular and pedestrian ways, and trails, with grades, widths and types of improvements; 9. Proposed vehicular access between site and public street; 10. Locations, names and widths of abutting streets; 11. Existing and proposed utilities; 12. Existing and proposed recreational facilities; 13. Existing and proposed storm drainage facilities; 14. Location of existing trees on the site;15. Locations and heights of existing and proposed retaining walls; 16. Locations and dimensions of trash disposal areas;17. Roof overhangs; 18. Distances between buildings and from building walls to property lines; 19. Proposed street names; 20. Handicap facilities;

B. Architectural drawings showing:

1. Floor plans at one-eighth inch or one-quarter inch equals one foot zero inches.
2. Four elevations (or more if necessary) to include all sides of development at no less than one-eighth inch equals one foot zero inches.

Response: The applicant has included all applicable information in the site plans. See Exhibit A.

C. Landscaping plan, including plant names and sizes, and an irrigation plan.

Response: Due to the industrial design of the PG&E tower, additional camouflage is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

D. A recent photograph of the site itself and of adjacent properties showing the current condition of the properties.

Response: The applicant has provided photo simulations of the project.

E. Color and texture chips of actual samples of materials.

Response: Due to the industrial design of the PG&E tower, the applicant asks for a color sample to be waived.

F. Additional information which may be requested by the planning commission including but not limited to the following:

1. Recent photographs of sight line profiles in sufficiently large scale, taken from commonly used vantage points in the city (shopping centers, road intersections, scenic lookouts, etc.) with the outline of the proposed structure in proper scale and perspective superimposed on it.

2. Architectural drawings showing the locations, size, color, shape, and type of illumination of each proposed sign.

G. Other information as determined by the city planner. [Ord. 07-1284 § 3 (Exh. C), 2007; Ord. 979 § 2 (Exh. A), 1990.]

Response to F & G: The applicant respectfully requests that any additional items or information required by the planning commission or city planner be communicated through a Notice of Incomplete (NOI) in accordance with the FCC 90-day shot clock as outlined in the Spectrum Act. This will ensure timely and efficient processing of the application.

Notice of Actions Affecting This Design Review Permit

In accordance with California Government Code Section 65945(a), The applicant requests notice of any proposal to adopt or amend the: general plan, specific plan, zoning ordinance, ordinance(s) affecting building or grading permits that would in any manner affect this development permit. Any such notice may be sent to 2009 V Street, Sacramento, CA 95818. Attn: Steve Proo.

Thank you,

Steve Proo
Planning Specialist – Land Use Development
Complete Wireless Consulting
sproo@completewireless.net
Cell – 916-838-6713

NOTICE OF INTENT

TO EXERCISE DESIGN REVIEW AUTHORITY DELEGATED TO STAFF PURSUANT TO PLANNING COMMISSION RESOLUTION NO. 9918

AT&T Equipment Enclosure and Addition of Wireless Communication Equipment to Existing 94' PG&E Tower, AP-25-0023 (ADR and MM).

This is an application filed by Steve Proo, on behalf of AT&T, requesting Administrative Design Review and Minor Modification approval to install new equipment for a wireless facility (collocation) on an existing 94' PG&E lattice tower located at 107 Greenmeadow Circle, Assessor's Parcel No. 093-320-068. The proposed project includes the installation of nine antennas at heights ranging from 34 to 47 feet, and the construction of a 247 square foot equipment enclosure. The proposed equipment enclosure will be constructed using brown fiberglass material to match existing adjacent enclosure on site. There is no landscaping or antenna camouflaging proposed as part of this application. The parcel is located in the Oak Hills Planned Development area, "PD-1204," within the "Open Space" General Plan district.

This project is delegated to staff under Category 2 (Wireless Communication Equipment), pursuant to Planning Commission Resolution No. 9918. Projects eligible for delegation under this category are limited to new or replacement antennas on existing poles and their related equipment.

Exhibit A

AT&T SITE NUMBER: CCL05107
AT&T SITE NAME: OAK HILLS

PROJECT / INITIATIVE: NSB
USID: 330424
FA CODE: 15521691
WOID: RFDS-7837
RFDS DATE: 10/14/24
JOB ID: WSSFR0017185
PTN: 3701A0YBSJ

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565
JURISDICTION: CITY OF PITTSBURG
APN: 093-320-068-5

SITE TYPE: OUTDOOR EQUIPMENT / PG&E LATTICE TOWER

PG&E INFORMATION

TOWER INFO:

TOWER SAP#:	40581785
TOWER#:	6/30
LINE NAME:	TBD

PG&E CONTACT INFO:

PROJECT MANAGER:	STEVEN MILLIKEN (925) 222-0536 S6MA@PGE.COM
ADDRESS:	245 MARKET STREET, MAIL CODE N10D SAN FRANCISCO, CA 94105

PROJECT DESCRIPTION

A (N) AT&T UNMANNED TELECOMMUNICATION FACILITY CONSISTING OF:

- (N) LEASE AREAS W/ (N) GROUND MOUNTED EQUIPMENT CABINETS & (N) UTILITIES TO (N) SITE LOCATION.
- (N) ANTENNAS & ANTENNA EQUIPMENT ON (E) PG&E LATTICE TOWER

PROJECT INFORMATION

SITE NAME:	OAK HILLS
SITE #:	CCL05107
COUNTY:	CONTRA COSTA
JURISDICTION:	CITY OF PITTSBURG
APN:	093-320-068-5
SITE ADDRESS:	107 GREENMEADOW CIRCLE PITTSBURG, CA 94565
CURRENT ZONING:	(PD) PLANNED DEVELOPMENT
CONSTRUCTION TYPE:	V-B
OCCUPANCY TYPE:	U, (UNMANNED COMMUNICATIONS FACILITY)
POWER:	PG&E
LATITUDE:	N 38° 00' 49.45" NAD 83 N 38.013735° NAD 83
LONGITUDE:	W 121° 57' 16.98" NAD 83 W 121.954716° NAD 83
GROUND ELEVATION:	318.5' AMSL
PROPERTY OWNER:	WEST COAST HOME BUILDERS, INC. 4021 PORT CHICAGO HIGHWAY CONCORD, CA 94520
TOWER OWNER:	PACIFIC GAS & ELECTRIC COMPANY 245 MARKET STREET MAIL CODE N10D ATTN: STEVEN MILLIKEN (925) 222-0536 S6MA@PGE.COM
APPLICANT:	AT&T MOBILITY 5005 EXECUTIVE PARKWAY SAN RAMON, CA 94583
SITE ACQUISITION COMPANY:	COMPLETE WIRELESS CONSULTING 2009 V STREET SACRAMENTO, CA 95818
LEASING CONTACT:	ATTN: ROCKY CORDOVA (916) 616-0468 RCORDOVA@COMPLETEWIRELESS.NET
ZONING CONTACT:	ATTN: STEVE PROO (916) 838-6713 SPROO@COMPLETEWIRELESS.NET
CIVIL VENDOR:	JACOBS ATTN: TIM LENCIONI (916) 437-9119 TIMOTHY.LENCIONI@US.AMENTUM.COM

VICINITY MAP



DRIVING DIRECTIONS

FROM: 5005 EXECUTIVE PARKWAY, SAN RAMON, CA 94583
TO: 107 GREENMEADOW CIRCLE, PITTSBURG, CA 94565

1.	GET ON I-680 N IN DANVILLE FROM CAMINO RAMON	
2.	HEAD WEST	85 FT
3.	TURN RIGHT	0.1 MI
4.	TURN RIGHT TOWARD EXECUTIVE PKWY	292 FT
5.	TURN RIGHT ONTO EXECUTIVE PKWY	0.2 MI
6.	TURN LEFT ONTO CAMINO RAMON	0.8 MI
7.	USE THE LEFT 2 LANES TO TURN LEFT ONTO CROW CANYON RD	0.3 MI
8.	USE THE RIGHT 2 LANES TO TURN RIGHT TO MERGE ONTO I-680 N TOWARD SACRAMENTO	0.4 MI
9.	MERGE ONTO I-680 N	14.1 MI
10.	KEEP RIGHT AT THE FORK TO CONTINUE ON CA-242 N, FOLLOW SIGNS FOR CONCORD/PITTSBURG/STATE ROUTE 242	3.2 MI
11.	USE THE LEFT 3 LANES TO MERGE ONTO CA-4 E TOWARD STOCKTON/PITTSBURG	4.2 MI
12.	TAKE EXIT 19 FOR SAN MARCO BLVD/WILLOW PASS RD TOWARD BAY POINT	0.3 MI
13.	TURN RIGHT ONTO SAN MARCO BLVD	0.2 MI
14.	USE THE LEFT 2 LANES TO TURN LEFT ONTO W LELAND RD	0.8 MI
15.	TURN RIGHT ONTO WOODHILL DR	0.3 MI
16.	TURN RIGHT ONTO GREENMEADOW CIR	
17.	DESTINATION WILL BE ON THE RIGHT	

END AT: 107 GREENMEADOW CIRCLE, PITTSBURG, CA 94565

ESTIMATED TIME: 29 MINUTES ESTIMATED DISTANCE: 24.9 MILES

CODE COMPLIANCE

ALL WORK & MATERIALS SHALL BE PERFORMED & INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUED TO PERMIT WORK NOT CONFORMING TO THESE CODES:

2022 CALIFORNIA ADMINISTRATIVE CODE, PART 1, TITLE 24 C.C.R.
2022 CALIFORNIA BUILDING CODE (CBC), PART 2, VOLUME 1&2, TITLE 24 C.C.R.
(2021 INTERNATIONAL BUILDING CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA ELECTRICAL CODE (CEC), PART 3, TITLE 24 C.C.R.
(2020 NATIONAL ELECTRICAL CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA MECHANICAL CODE (CMC) PART 4, TITLE 24 C.C.R.
(2021 UNIFORM MECHANICAL CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA PLUMBING CODE (CPC), PART 5, TITLE 24 C.C.R.
(2021 UNIFORM PLUMBING CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA ENERGY CODE (CEC), PART 6, TITLE 24 C.C.R.
2022 CALIFORNIA FIRE CODE, PART 9, TITLE 24 C.C.R.
(2021 INTERNATIONAL FIRE CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA GREEN BUILDING STANDARDS CODE, PART 11, TITLE 24 C.C.R.
2022 CALIFORNIA REFERENCED STANDARDS, PART 12, TITLE 24 C.C.R.
ANSI/EIA-TIA-222-H

ALONG WITH ANY OTHER APPLICABLE LOCAL & STATE LAWS AND REGULATIONS

DISABLED ACCESS REQUIREMENTS

THIS FACILITY IS UNMANNED & NOT FOR HUMAN HABITATION. DISABLED ACCESS & REQUIREMENTS ARE NOT REQUIRED IN ACCORDANCE WITH CALIFORNIA STATE BUILDING CODE, TITLE 24 PART 2, SECTION 11B-203.5

SHEET INDEX

SHEET	DESCRIPTION	REV
T-1.1	TITLE SHEET	-
C-1	TOPOGRAPHIC SURVEY	-
A-1.1	OVERALL SITE PLAN	-
A-1.2	ENLARGED SITE PLAN	-
A-1.3	EQUIPMENT PLAN	-
A-2.1	ANTENNA PLAN	-
A-3.1	(E) ELEVATIONS	-
A-3.2	(N) ELEVATIONS	-
A-4.1	ANTENNA DETAILS	-
A-4.2	EQUIPMENT DETAILS	-
E-1.1	ELECTRICAL PLAN	-

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t
5005 Executive Parkway
San Ramon, California 94583

Vendor:

COMPLETE Wireless Consulting, Inc.

AT&T SITE NO:	CCL05107
PROJECT NO:	N/A
DRAWN BY:	T.T.
CHECKED BY:	J. GRAY
APPROVED BY:	-

ISSUE STATUS

REV	DATE	DESCRIPTION	CAD
2	03/11/25	CLIENT REV	T.T.
1	01/23/25	ZD 100%	T.T.
0	08/30/24	ZD 90%	T.T.

Licensee:

PRELIMINARY:
NOT FOR CONSTRUCTION

KEVIN R. SORENSEN
S4469

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ENGINEER:

Streamline Engineering and Design, Inc.
3843 Taylor Road, Suite A, Loomis, CA 95650
Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

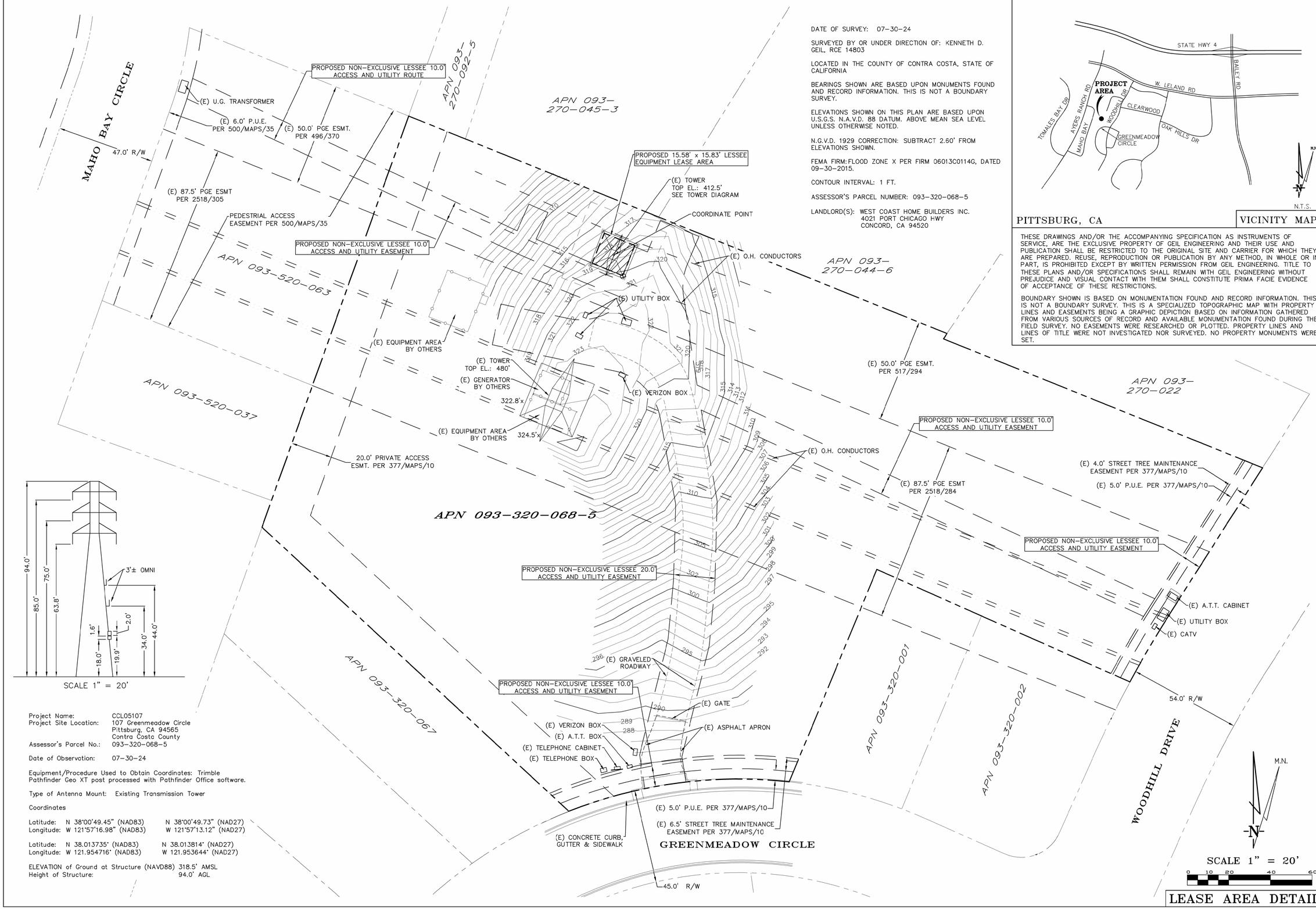
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SHEET TITLE:

TITLE SHEET

SHEET NUMBER:

T-1.1



Project Name: CCL05107
Project Site Location: 107 Greenmeadow Circle
Pittsburg, CA 94565
Contra Costa County
Assessor's Parcel No.: 093-320-068-5

Date of Observation: 07-30-24

Equipment/Procedure Used to Obtain Coordinates: Trimble Pathfinder Geo XT post processed with Pathfinder Office software.

Type of Antenna Mount: Existing Transmission Tower

Coordinates

Latitude: N 38°00'49.45" (NAD83) N 38°00'49.73" (NAD27)
Longitude: W 121°57'16.98" (NAD83) W 121°57'13.12" (NAD27)

Latitude: N 38.013735° (NAD83) N 38.013814° (NAD27)
Longitude: W 121.954716° (NAD83) W 121.953644° (NAD27)

ELEVATION of Ground at Structure (NAVD88) 318.5' AMSL
Height of Structure: 94.0' AGL

DATE OF SURVEY: 07-30-24

SURVEYED BY OR UNDER DIRECTION OF: KENNETH D. GEIL, RCE 14803

LOCATED IN THE COUNTY OF CONTRA COSTA, STATE OF CALIFORNIA

BEARINGS SHOWN ARE BASED UPON MONUMENTS FOUND AND RECORD INFORMATION. THIS IS NOT A BOUNDARY SURVEY.

ELEVATIONS SHOWN ON THIS PLAN ARE BASED UPON U.S.G.S. N.A.V.D. 88 DATUM. ABOVE MEAN SEA LEVEL UNLESS OTHERWISE NOTED.

N.G.V.D. 1929 CORRECTION: SUBTRACT 2.60' FROM ELEVATIONS SHOWN.

FEMA FIRM: FLOOD ZONE X PER FIRM 06013C0114G, DATED 09-30-2015.

CONTOUR INTERVAL: 1 FT.

ASSESSOR'S PARCEL NUMBER: 093-320-068-5

LANDLORD(S): WEST COAST HOME BUILDERS INC.
4021 PORT CHICAGO HWY
CONCORD, CA 94520

PITTSBURG, CA

VICINITY MAP

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DEPT	APPROVED	DATE
A&C		
RE		
RF		
INT		
EE\IN		
OPS		
EE\OUT		

Surveyor
GEIL ENGINEERING
ENGINEERING • SURVEYING • PLANNING
1226 HIGH STREET
AUBURN, CALIFORNIA 95603
phone: (530) 885-0428
fax: (530) 823-1309

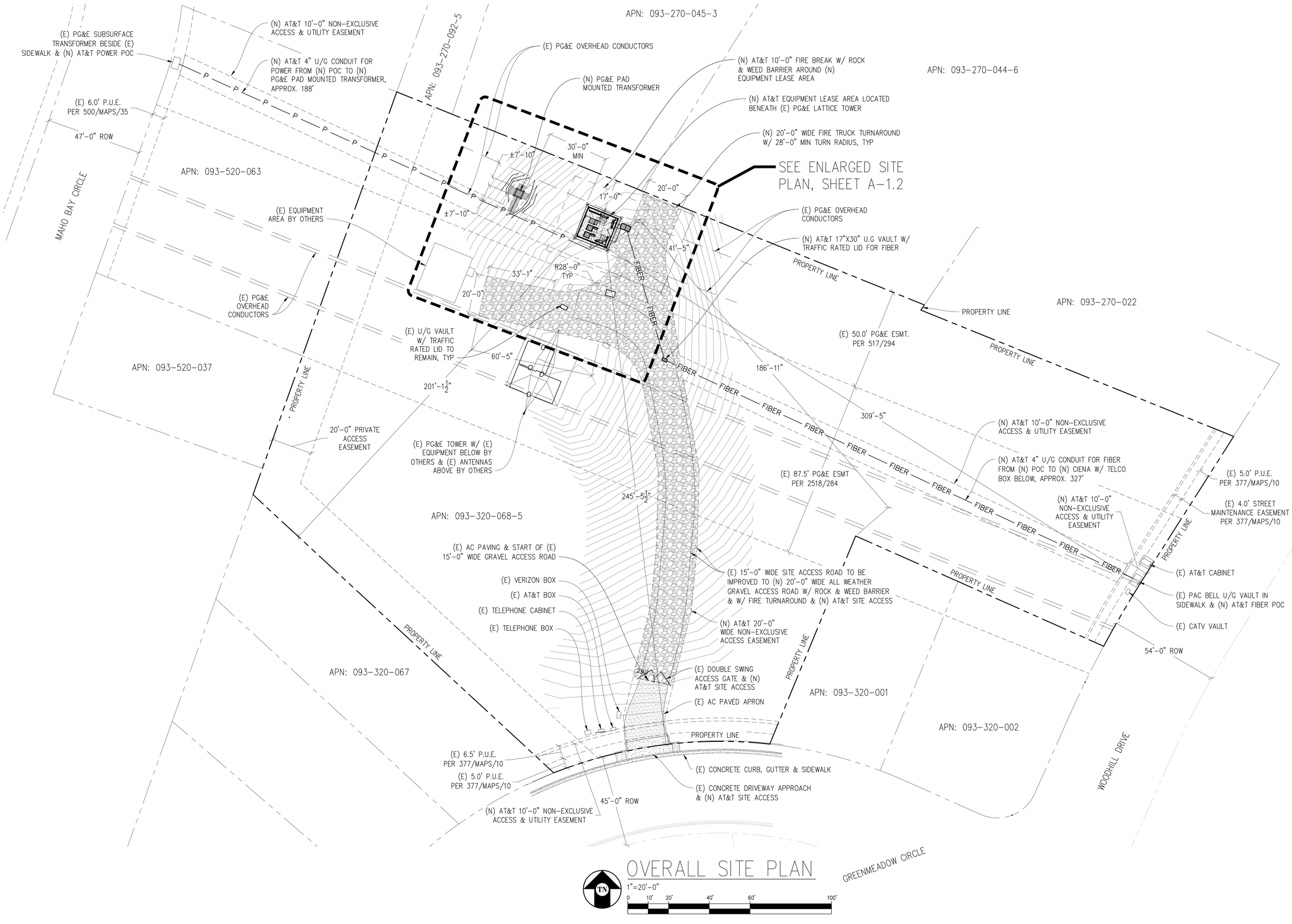
at&t MOBILITY

CCL05107
107 Greenmeadow Circle
Pittsburg, CA 94565

PLOT PLAN AND SITE TOPOGRAPHY

REVISIONS		
08-06-24	Preliminary Drawing	dg
08-27-24	update tower diag.	dg
01-23-25	rev. lease/esmts	dg
03-12-25	rev. lease/esmts	dg

Sheet
C-1



OVERALL SITE PLAN

1"=20'-0"

0 10' 20' 40' 60' 100'

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

5005 Executive Parkway
San Ramon, California 94583

Vendor:

COMPLETE
Wireless Consulting, Inc.

AT&T SITE NO:	CCL05107
PROJECT NO:	N/A
DRAWN BY:	T.T.
CHECKED BY:	J. GRAY
APPROVED BY:	-

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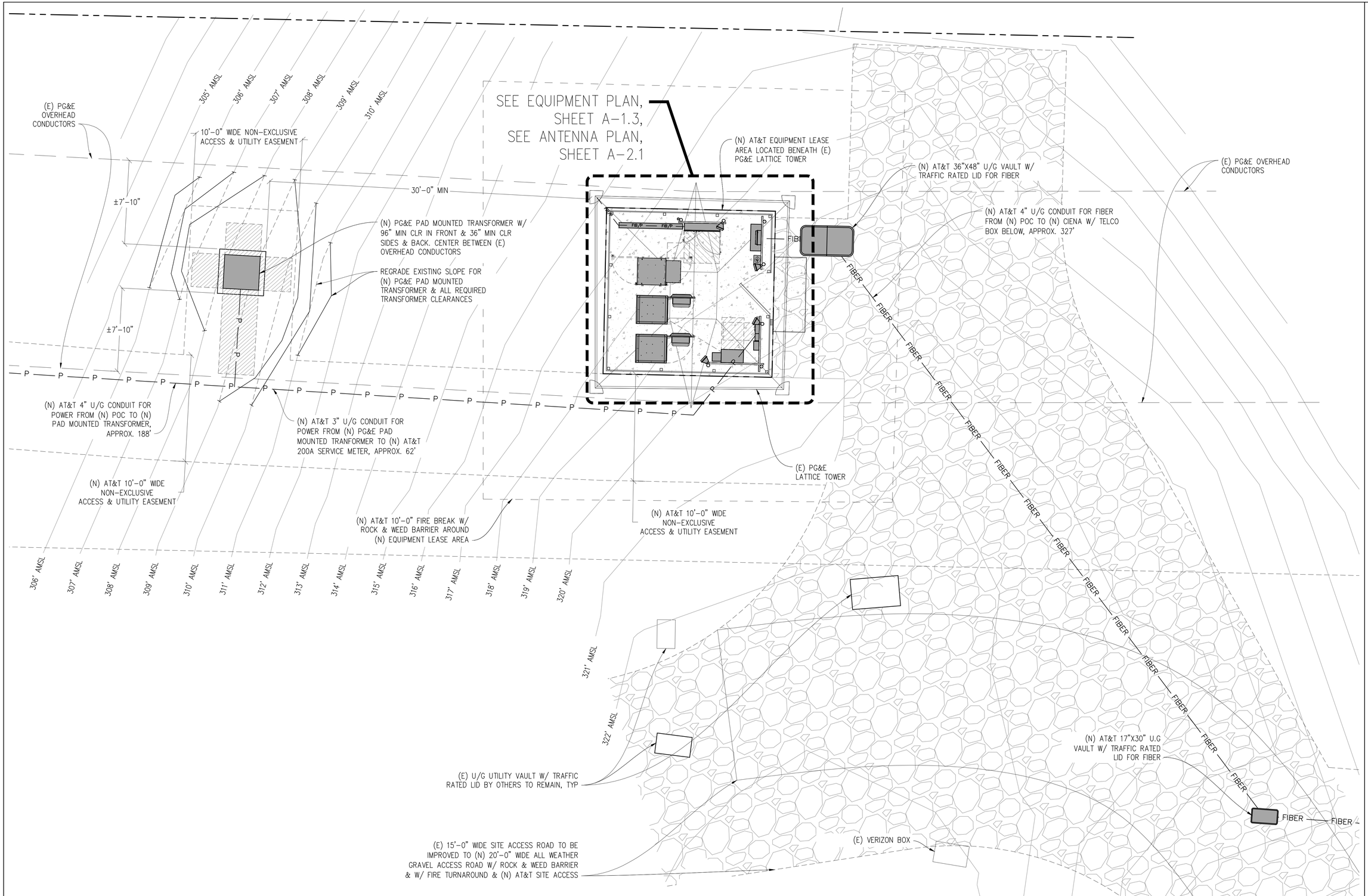
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SHEET TITLE:

OVERALL
SITE PLAN

SHEET NUMBER:

A-1.1



ENLARGED SITE PLAN

1/4"=1'-0"

0 1' 2' 4' 6' 10' 14' 20'

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

5005 Executive Parkway
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AT&T SITE NO:	CCL05107
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Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

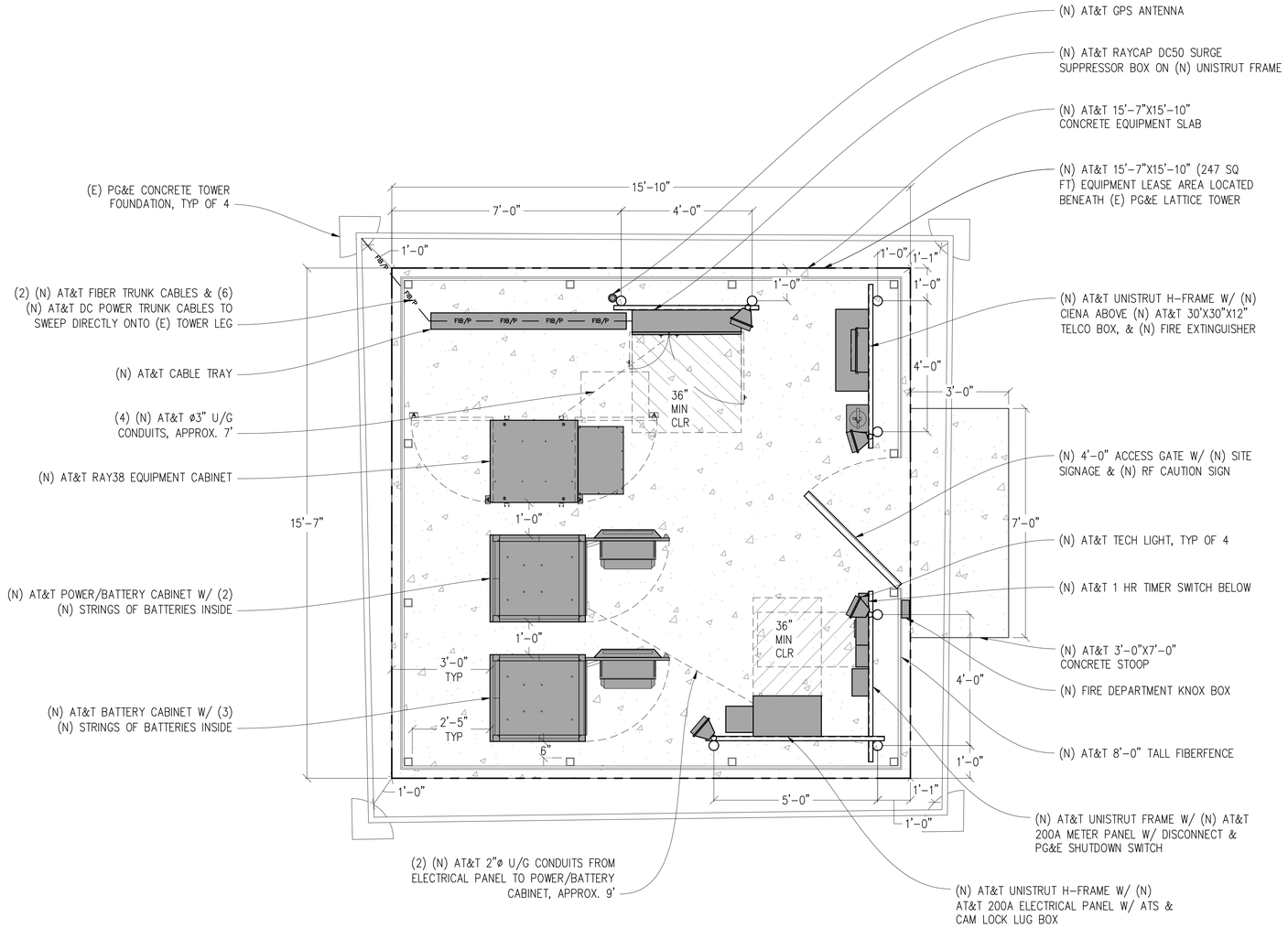
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SHEET TITLE:

ENLARGED SITE PLAN

SHEET NUMBER:

A-1.2



NOTE: PROVIDE (N) AT&T 10'-0" FIRE BREAK W/ ROCK & WEED BARRIER AROUND (N) EQUIPMENT LEASE AREA

EQUIPMENT PLAN

½"=1'-0"

0 6" 1' 2' 3' 5' 7' 10'

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

5005 Executive Parkway
San Ramon, California 94583

Vendor:

COMPLETE Wireless Consulting, Inc.

AT&T SITE NO:	CCL05107
PROJECT NO:	N/A
DRAWN BY:	T.T.
CHECKED BY:	J. GRAY
APPROVED BY:	-

ISSUE STATUS

REV	DATE	DESCRIPTION	CAD
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1	01/23/25	ZD 100%	T.T.
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SHEET TITLE:

EQUIPMENT PLAN

SHEET NUMBER:

A-1.3

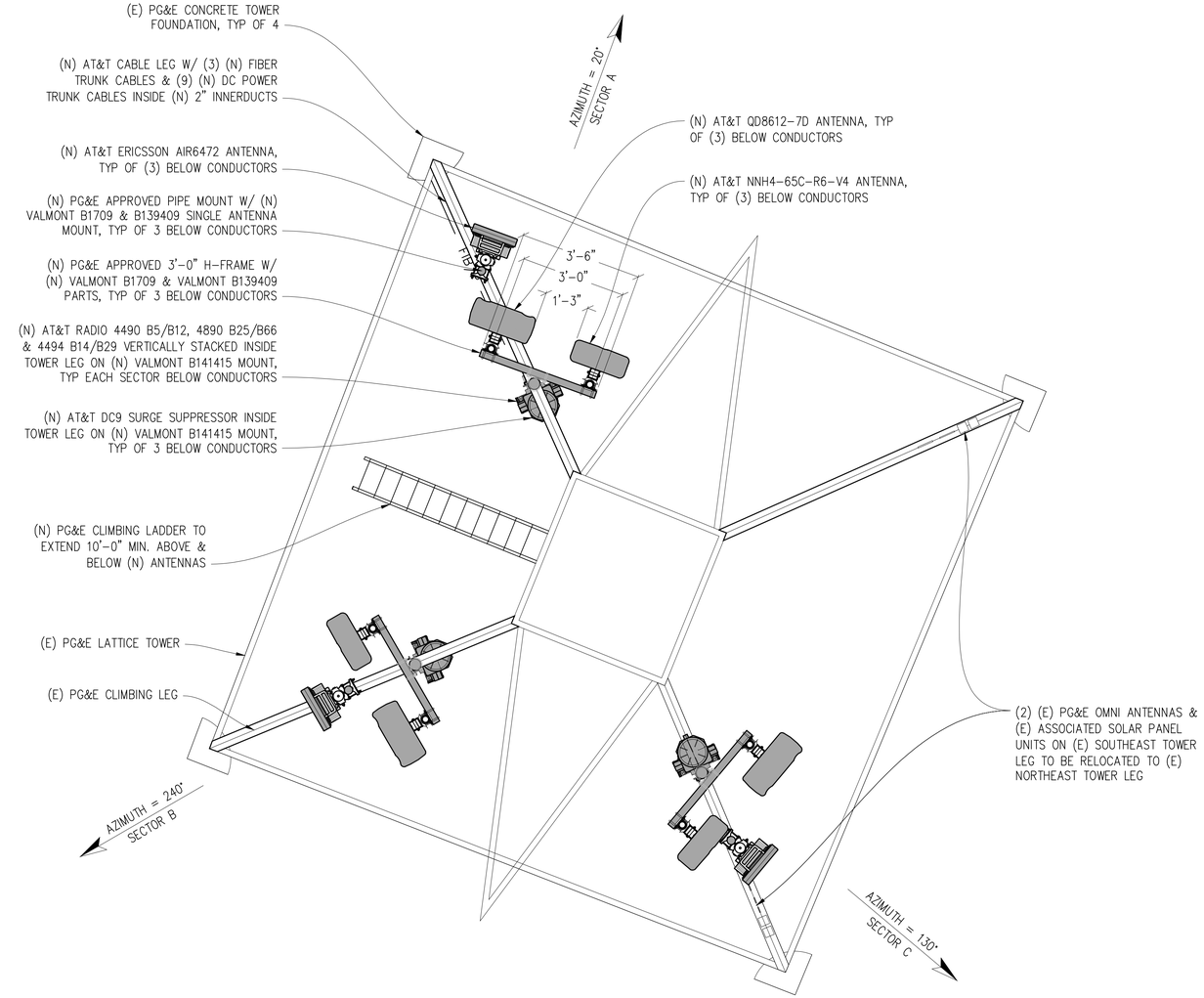
ANTENNA & CABLE SCHEDULE (PRELIMINARY & SUBJECT TO CHANGE)

SECTOR		ANTENNA MODEL NO.	AZIMUTH	CENTERLINE	RRU NO'S & MODEL #	JUMPERS	# OF DC POWER CABLES	# OF FIBER CABLES	LENGTH OF CABLES	SURGE SUPPRESSOR	NO. OF DIPLEXERS	NO. OF COMBINERS
ALPHA	A1	QUINTEL QD8612-7D	20°	±49'-10"	(1) 4490 B5/B12A, (1) 4890 B25/B66	-	(3)	(1)	-	(1) DC9	0	0
	A2	COMMSCOPE NNH4-65C-R6-V4	20°	±49'-10"	(1) 4494 B14/B29	-	SHARED	SHARED	-	SHARED	0	0
	A3	ERICSSON AIR6472 B77G/B77M	20°	±42'-3"	INTEGRATED	-	SHARED	SHARED	-	SHARED	0	0
BETA	B1	QUINTEL QD8612-7D	240°	±49'-10"	(1) 4490 B5/B12A, (1) 4890 B25/B66	-	(3)	(1)	-	(1) DC9	0	0
	B2	COMMSCOPE NNH4-65C-R6-V4	240°	±49'-10"	(1) 4494 B14/B29	-	SHARED	SHARED	-	SHARED	0	0
	B3	ERICSSON AIR6472 B77G/B77M	240°	±42'-3"	INTEGRATED	-	SHARED	SHARED	-	SHARED	0	0
GAMMA	C1	QUINTEL QD8612-7D	130°	±49'-10"	(1) 4490 B5/B12A, (1) 4890 B25/B66	-	(3)	(1)	-	(1) DC9	0	0
	C2	COMMSCOPE NNH4-65C-R6-V4	130°	±49'-10"	(1) 4494 B14/B29	-	SHARED	SHARED	-	SHARED	0	0
	C3	ERICSSON AIR6472 B77G/B77M	130°	±42'-3"	INTEGRATED	-	SHARED	SHARED	-	SHARED	0	0

RFDS DATE	10/14/24

NOTE:
1. ANTENNA POSITIONS ARE LEFT TO RIGHT FROM BACK OF SECTOR
2. EQUIPMENT IS PRELIMINARY & SUBJECT TO CHANGE.

NOTE: MAINTAIN 16" MIN SEPARATION BETWEEN ALL VERTICALLY STACKED RADIOS & SURGE PROTECTOR



TN

ANTENNA PLAN

1/2"=1'-0"

0 6" 1' 2' 3' 5' 7' 10'

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

5005 Executive Parkway
San Ramon, California 94583

Vendor:

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Wireless Consulting, Inc.

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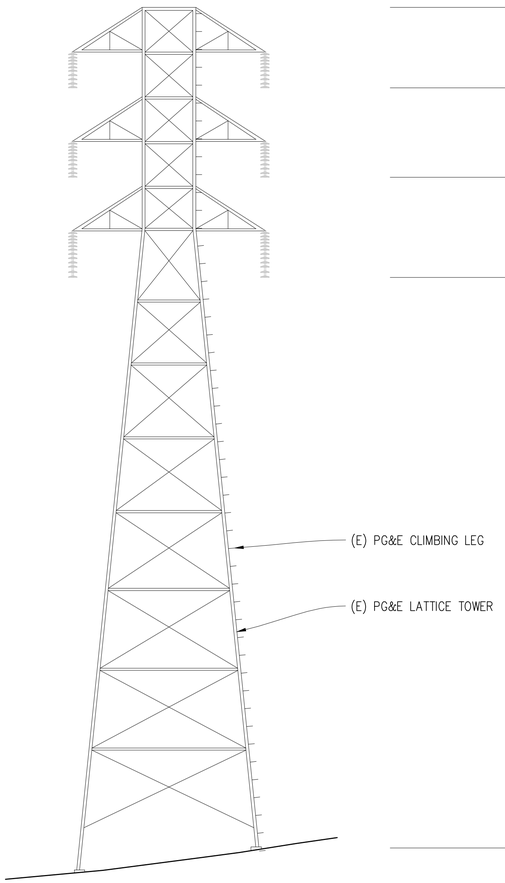
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SHEET TITLE:

ANTENNA PLANS

SHEET NUMBER:

A-2.1



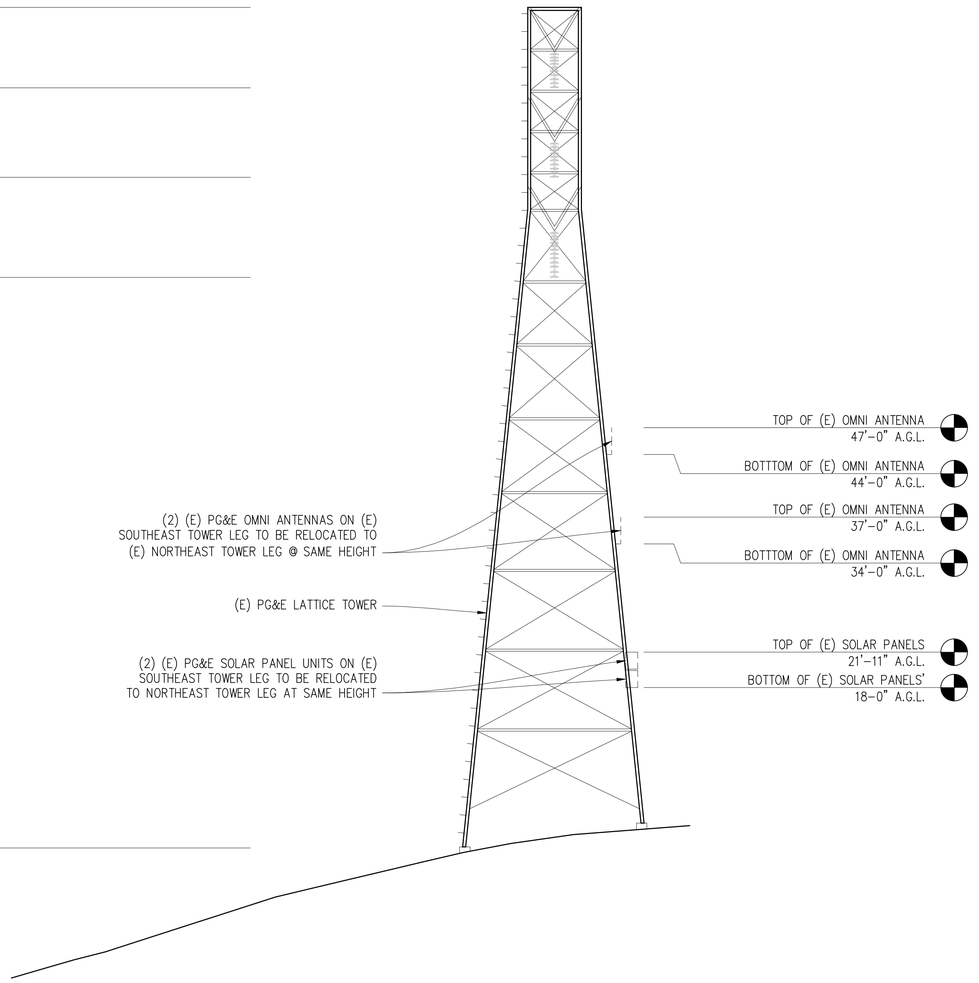
TOP OF (E) PG&E LATTICE TOWER
94'-0" A.G.L.

BOTTOM OF (E) PG&E CONDUCTORS
85'-0" A.G.L.

BOTTOM OF (E) PG&E CONDUCTORS
75'-0" A.G.L.

BOTTOM OF (E) PG&E CONDUCTORS
63'-.10' A.G.L.

GROUND LEVEL @ CENTER OF (E) TOWER
0.0' A.G.L. (318.5' AMSL)



(E) WEST ELEVATION

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

(E) SOUTH ELEVATION

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

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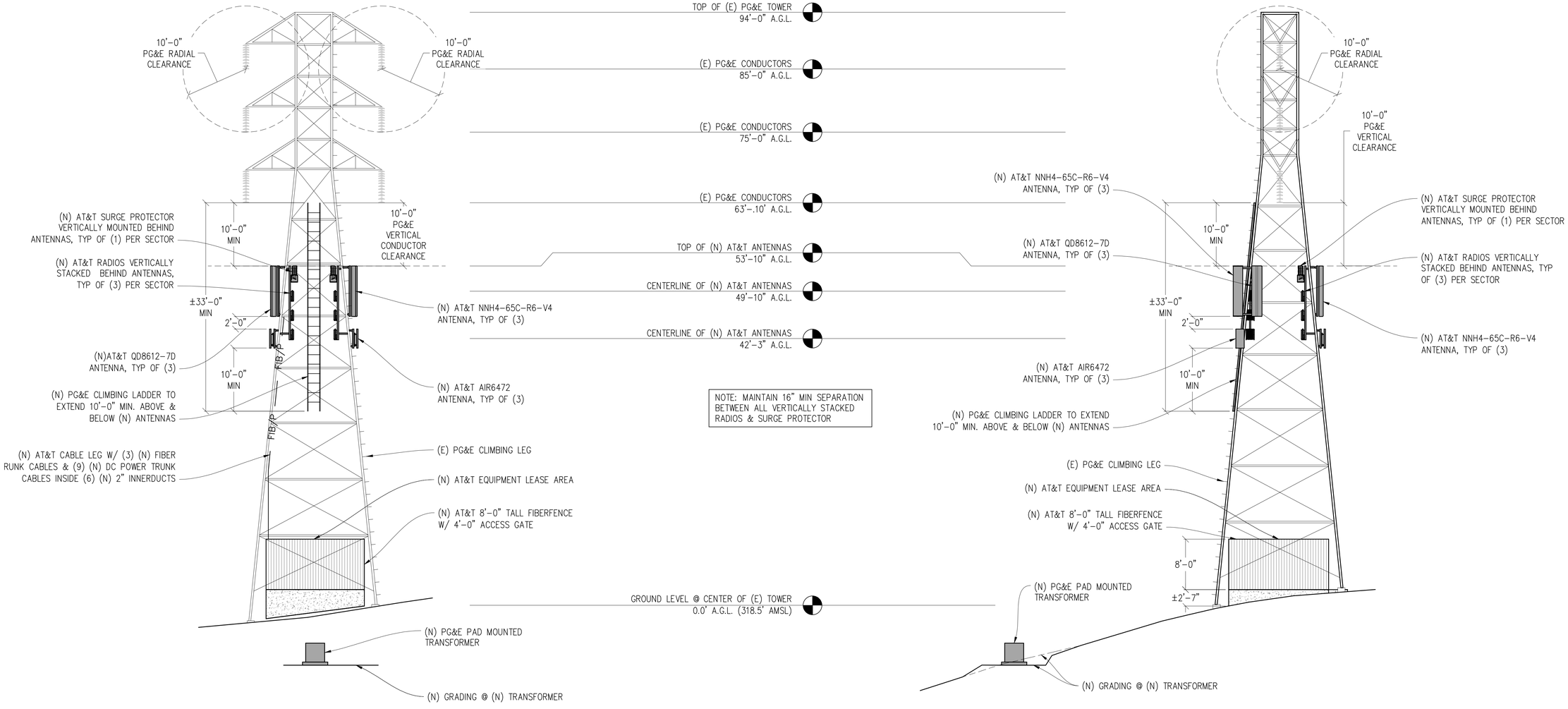
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SHEET TITLE:

(E) ELEVATIONS

SHEET NUMBER:

A-3.1



(N) WEST ELEVATION

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

(N) SOUTH ELEVATION

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

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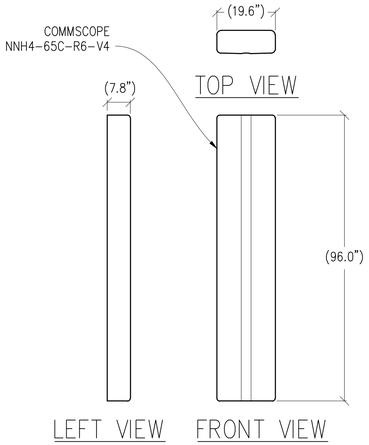
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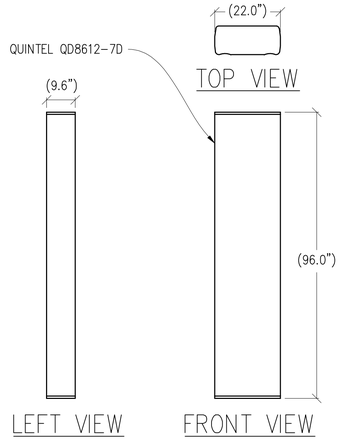
SHEET NUMBER:

A-3.2



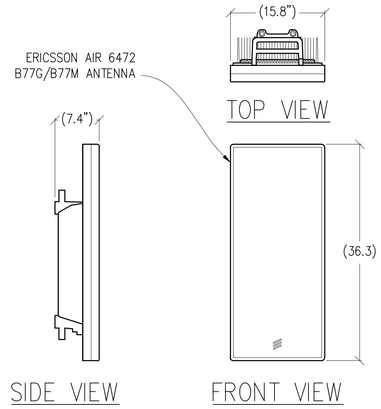
1 ANTENNA DETAIL

½"=1' MAX WEIGHT: 100.53 LBS



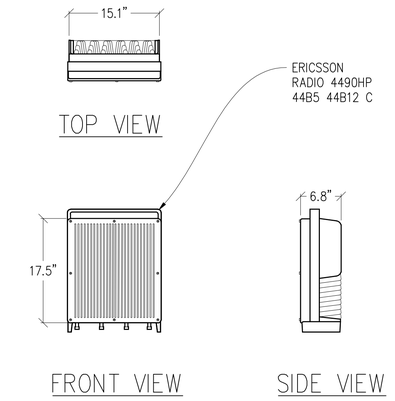
2 ANTENNA DETAIL

½"=1'-0" WEIGHT: 126.5 LBS



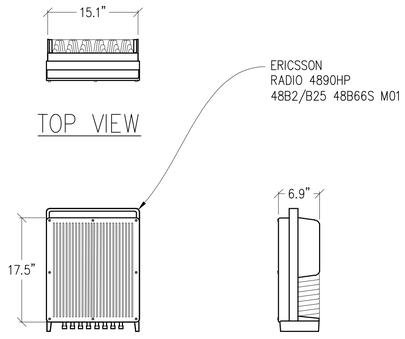
3 ANTENNA DETAIL

1"=1'-0" MAX WEIGHT: 88.62 LBS



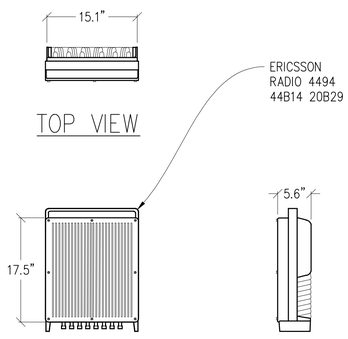
4 RADIO 4490HP DETAIL

1"=1'-0" MAX WEIGHT: 68.0 LBS



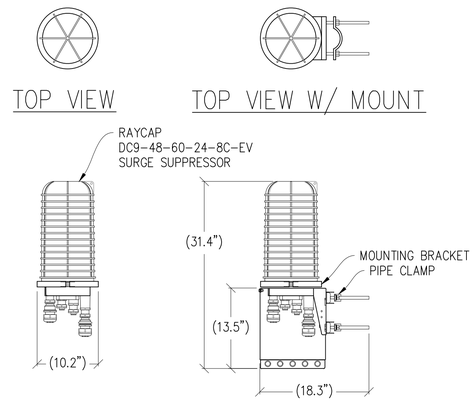
5 RADIO 4890HP DETAIL

1"=1'-0" MAX WEIGHT: 68.0 LBS



6 RADIO 4494 DETAIL

1"=1'-0" MAX WEIGHT: 57.3 LBS



7 SURGE SUPPRESSOR DETAIL

1"=1'-0" MAX WEIGHT = 26.2 LBS

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

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at&t

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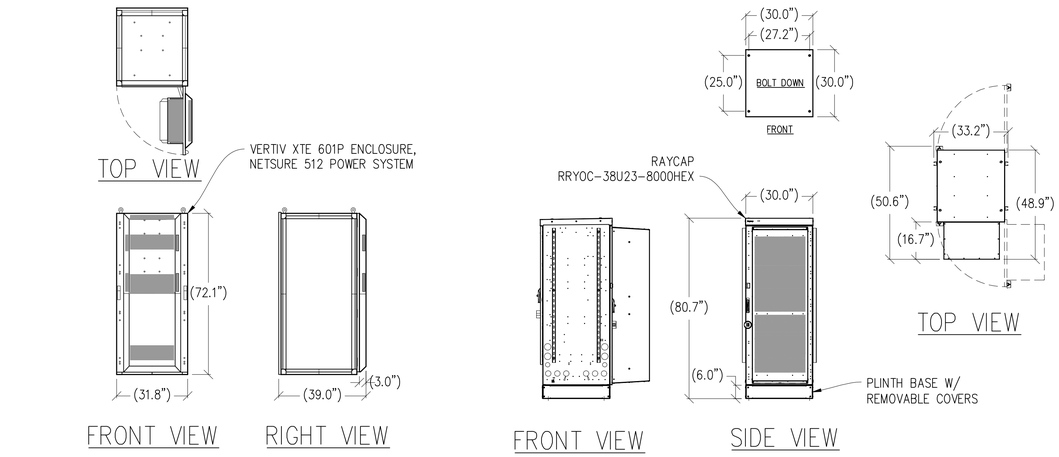
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SHEET TITLE:

ANTENNA
DETAILS

SHEET NUMBER:

A-4.1

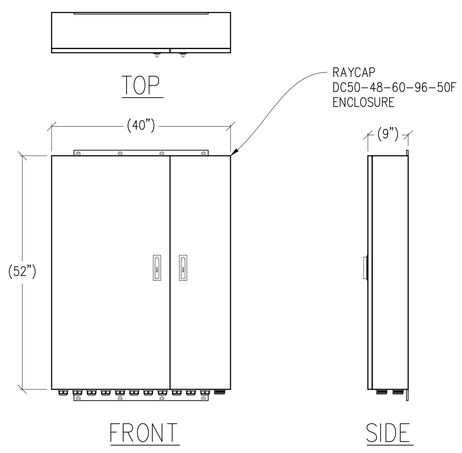


1 DC POWER PLANT DETAIL

⅜"=1'-0" MAX WEIGHT: 2348 LBS W/ (8) BATTERIES

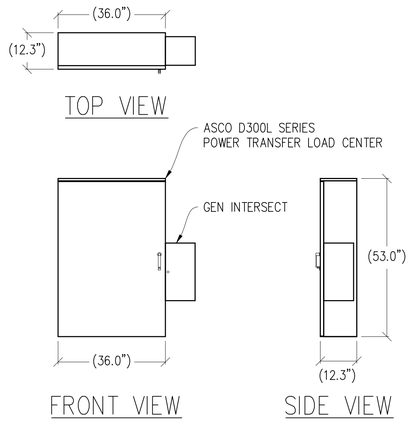
2 RAY38 DETAIL

⅜"=1'-0" EMPTY WEIGHT: 1440 LBS



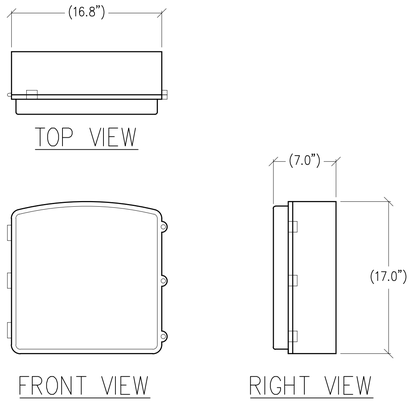
3 RAYCAP DC50 DETAIL

¾"=1'-0" MAX WEIGHT: 165 LBS



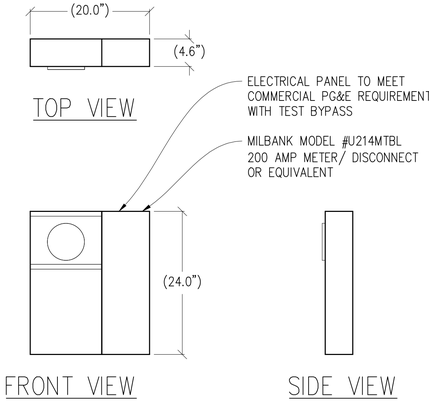
4 ELECTRICAL PANEL DETAIL

½"=1'-0" MAX WEIGHT: 210 LBS



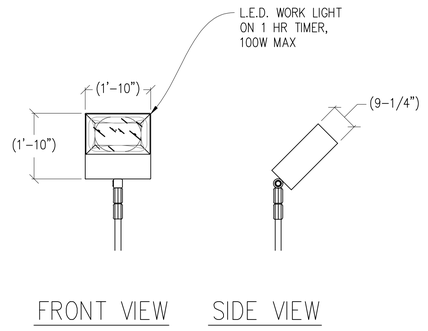
5 CN 3931 DETAIL

1½"=1'-0" MAX WEIGHT: 28.6 LBS



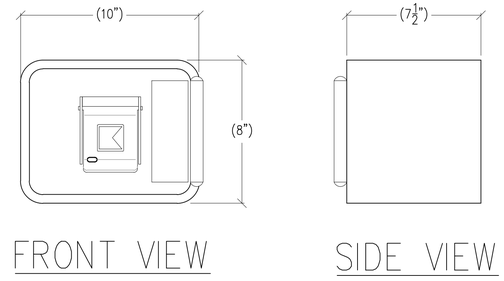
6 METER DETAIL

1"=1'-0"



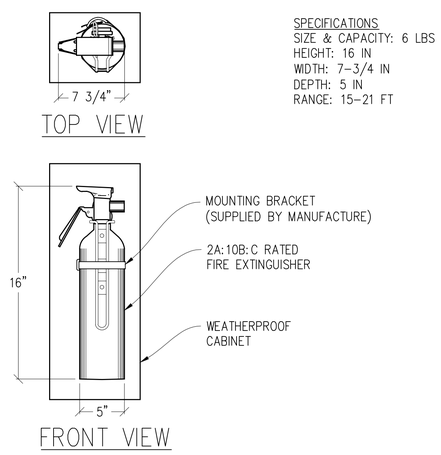
7 TECH LIGHT DETAIL

½"=1'-0"



8 KNOX-BOX 3200 DETAIL

3"=1'-0"



9 FIRE EXTINGUISHER DETAIL

N.T.S.

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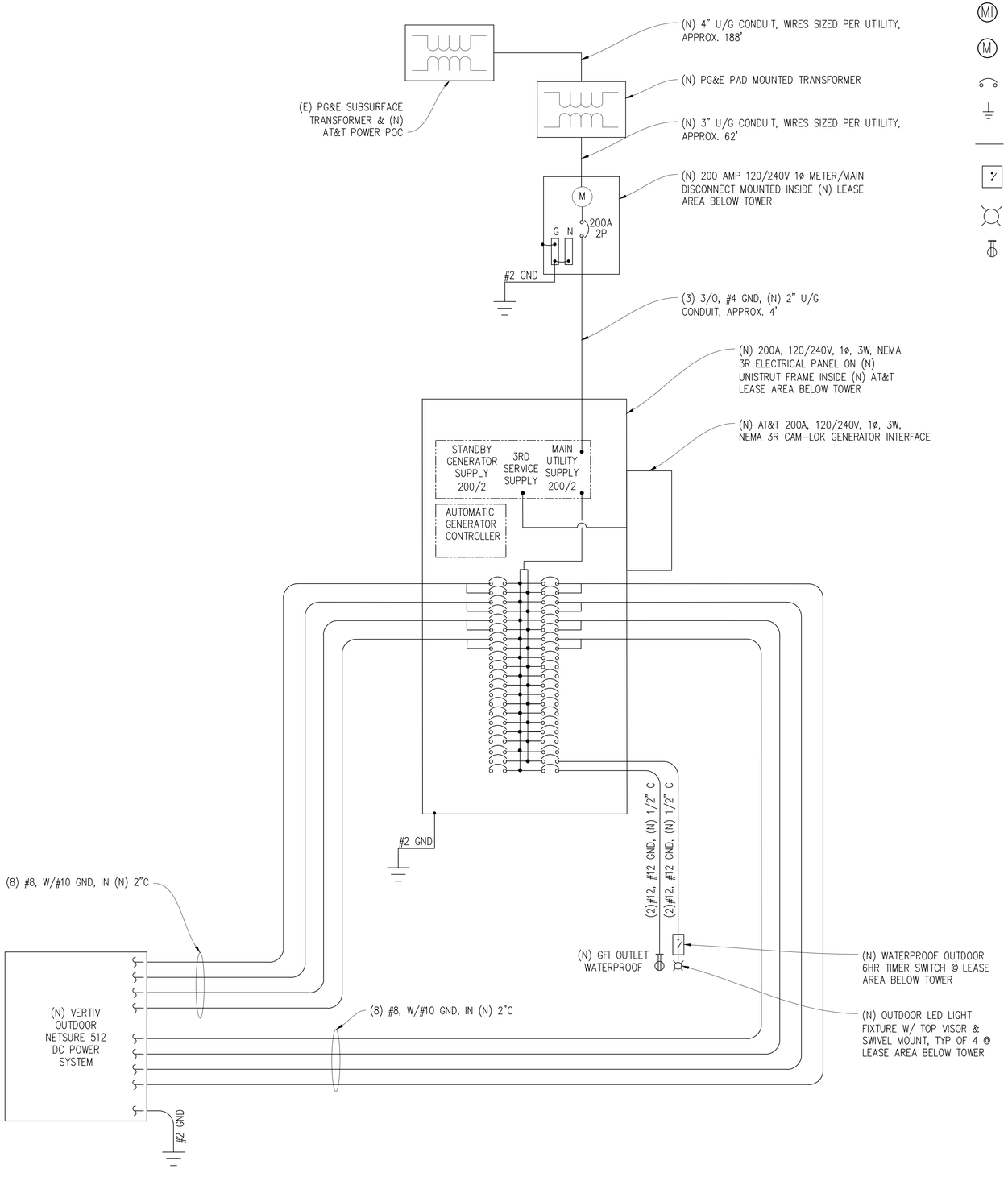
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DETAILS

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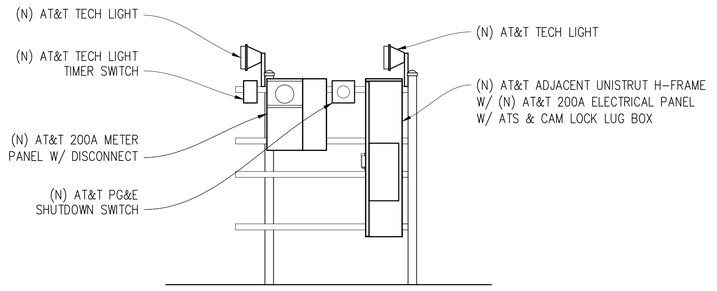
A-4.2



SINGLE LINE DIAGRAM

ELECTRICAL LEGEND

- MI — MECHANICAL INTERLOCK
- M — METER
- CIRCUIT BREAKER
- SERVICE GROUND
- WIRED CONNECTION
- TIMER SWITCH, WATERPROOF
- OUTDOOR LIGHT
- GFI OUTLET, WATERPROOF



(N) H-FRAME ELEVATION

NAMEPLATE : PANEL A			SC LEVEL : 10,000				VOLTS: 120V/240V, 1ø		
LOCATION : OUTSIDE							BUS AMPS: 200A		
MOUNTING : UNISTRUT FRAME							MAIN CB: 200A		
ØA	ØB		BKR AMP/ POLE	CIRCUIT NO		BKR AMP/ POLE		ØA	ØB
LOAD VA	LOAD VA	LOAD DESCRIPTION					LOAD DESCRIPTION	LOAD VA	LOAD VA
2150		RECTIFIERS 1 & 2	30/2	1	2	30/2	RECTIFIERS 3 & 4	2150	
	2150	" "	" "	3	4	" "	" "		2150
2150		RECTIFIERS 5 & 6	30/2	5	6	30/2	RECTIFIERS 7 & 8	2150	
	2150	" "	" "	7	8	" "	" "		2150
2150		RECTIFIERS 9 & 10	30/2	9	10	30/2	RECTIFIERS 11 & 12	2150	
	2150	" "	" "	11	12	" "	" "		2150
2150		RECTIFIERS 13 & 14	30/2	13	14	30/2	RECTIFIERS 15 & 16	2150	
	2150	" "	" "	15	16	" "	" "		2150
0		BLANK	–	17	18	–	BLANK	0	
	0	" "	–	19	20	–	" "		0
0		" "	–	21	22	–	" "	0	
	0	" "	–	23	24	–	" "		0
0		" "	–	25	26	–	" "	0	
	0	" "	–	27	28	–	" "		0
0		" "	–	29	30	–	" "	0	
	0	" "	–	31	32	–	" "		0
0		" "	–	33	34	–	" "	0	
	0	" "	–	35	36	–	" "		0
0		" "	–	37	38	–	" "	0	
	0	" "	–	39	40	20/1	TECH LIGHTS		300
0		" "	–	41	42	20/1	GFI RECEPTACLE	180	
8600	8600	PHASE TOTALS					PHASE TOTALS	8780	8900
TOTAL VA =	34880	TOTAL AMPS =	145						

NEW PANEL SCHEDULE

Issued For:

CCL05107
OAK HILLS

107 GREENMEADOW CIRCLE
PITTSBURG, CA 94565

PREPARED FOR

at&t

5005 Executive Parkway
San Ramon, California 94583

Vendor:

COMPLETE Wireless Consulting, Inc.

AT&T SITE NO:	CCL05107
PROJECT NO:	N/A
DRAWN BY:	T.T.
CHECKED BY:	J. GRAY
APPROVED BY:	-

ISSUE STATUS

REV	DATE	DESCRIPTION	CAD
2	03/11/25	CLIENT REV	T.T.
1	01/23/25	ZD 100%	T.T.
0	08/30/24	ZD 90%	T.T.

Licensee:

PRELIMINARY: NOT FOR CONSTRUCTION

KEVIN R. SORENSEN
S4469

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.

ENGINEER:

Streamline Engineering and Design, Inc.
3843 Taylor Road, Suite A, Loomis, CA 95650
Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

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SHEET TITLE:

ELECTRICAL PLAN

SHEET NUMBER:

E-1.1

Federal Communications Commission - Local and State Government Advisory Committee
(June 2000)

A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance

Over the past two years, the Federal Communications Commission (FCC) and its Local and State Government Advisory Committee (LSGAC) have been working together to prepare a voluntary guide to assist state and local governments in devising efficient procedures for ensuring that the antenna facilities located in their communities comply with the FCC's limits for human exposure to radiofrequency (RF) electromagnetic fields. The attached guide is the product of this joint effort.

We encourage state and local government officials to consult this guide when addressing issues of facilities siting within their communities. This guide contains basic information, in a form accessible to officials and citizens alike, that will alleviate misunderstandings in the complex area of RF emissions safety. This guide is not intended to replace OET Bulletin 65, which contains detailed technical information regarding RF issues, and should continue to be used and consulted for complex sites. The guide contains information, tables, and a model checklist to assist state and local officials in identifying sites that do not raise concerns regarding compliance with the Commission's RF exposure limits. In many cases, the model checklist offers a quick and effective way for state and local officials to establish that particular RF facilities are unlikely to exceed specific federal guidelines that protect the public from the environmental effects of RF emissions. Thus, we believe this guide will facilitate federal, state, and local governments working together to protect the public while bringing advanced and innovative communications services to consumers as rapidly as possible. We hope and expect that use of this guide will benefit state and local governments, service providers, and, most importantly, the American public.

We wish all of you good luck in your facilities siting endeavors.

William E. Kennard, Chairman
Federal Communications Commission

Kenneth S. Fellman, Chair
Local and State Government
Advisory Committee

Federal Communications Commission - Local and State Government Advisory Committee (June 2000)

A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance

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APPENDIX A

Optional Checklist for Local Government
To Determine Whether a Facility is Categorically Excluded

Purpose: The FCC has determined that many wireless facilities are unlikely to cause human exposures in excess of RF exposure guidelines. Operators of those facilities are exempt from routinely having to determine their compliance. These facilities are termed "categorically excluded." Section 1.1307(b)(1) of the Commission's rules defines those categorically excluded facilities. This checklist will assist state and local government agencies in identifying those wireless facilities that are categorically excluded, and thus are highly unlikely to cause exposure in excess of the FCC's guidelines. Provision of the information identified on this checklist may also assist FCC staff in evaluating any inquiry regarding a facility's compliance with the RF exposure guidelines.

BACKGROUND INFORMATION

1. Facility Operator's Legal Name: New Cingular Wireless, PCS, LLC (AT&T)
2. Facility Operator's Mailing Address: 5001 Executive Pkwy, 4W850T, San Ramon, CA 94583
3. Facility Operator's Contact Name/Title: Phillip DeGuzman
4. Facility Operator's Office ~~Telephone:~~ Email - pd8326@att.com
5. Facility Operator's Fax:
6. Facility Name: CCL05107 - Oak Hills
7. Facility Address: 107 Greenmeadow Circle
8. Facility City/Community: Pittsburg
9. Facility State and Zip Code: CA, 94565
10. Latitude: N 38.013735 (NAD 83)
11. Longitude: W 121.954716 (NAD 83)

continue

Optional Local Government Checklist (page 2)

EVALUATION OF CATEGORICAL EXCLUSION

12. Licensed Radio Service (see attached Table 1): PCS 26
13. Structure Type (free-standing or building/roof-mounted): PG&E Tower Collocation
14. Antenna Type [omnidirectional or directional (includes sectored)]: Directional
15. Height above ground of the lowest point of the antenna (in feet): ~~41' at bottom of antennas~~ (53' to top antennas, 94' tower)
16. ☒ Check if all of the following are true:
    (a) This facility will be operated in the Multipoint Distribution Service, Paging and Radiotelephone Service, Cellular Radiotelephone Service, Narrowband or Broadband Personal Communications Service, Private Land Mobile Radio Services Paging Operations, Private Land Mobile Radio Service Specialized Mobile Radio, Local Multipoint Distribution Service, or service regulated under Part 74, Subpart I (see question 12).
    (b) This facility will not be mounted on a building (see question 13).
    (c) The lowest point of the antenna will be at least 32.8 feet (10 meters) above the ground (see question 15).

If box 16 is checked, this facility is categorically excluded and is unlikely to cause exposure in excess of the FCC's guidelines. The remainder of the checklist need not be completed. If box 16 is not checked, continue to question 17.

17. Enter the power threshold for categorical exclusion for this service from the attached Table 1 in watts ERP or EIRP* (note: EIRP = (1.64) X ERP): _____
18. Enter the total number of channels if this will be an omnidirectional antenna, or the maximum number of channels in any sector if this will be a sectored antenna:
19. Enter the ERP or EIRP per channel (using the same units as in question 17): _____
20. Multiply answer 18 by answer 19: _____
21. Is the answer to question 20 less than or equal to the value from question 17 (yes or no)?

If the answer to question 21 is YES, this facility is categorically excluded. It is unlikely to cause exposure in excess of the FCC's guidelines.

If the answer to question 21 is NO, this facility is not categorically excluded. Further investigation may be appropriate to verify whether the facility may cause exposure in excess of the FCC's guidelines.

*"ERP" means "effective radiated power" and "EIRP" means "effective isotropic radiated power

TABLE 1: TRANSMITTERS, FACILITIES AND OPERATIONS SUBJECT TO ROUTINE ENVIRONMENTAL EVALUATION

SERVICE (TITLE 47 CFR RULE PART)	EVALUATION REQUIRED IF:
Experimental Radio Services (part 5)	power > 100 W ERP (164 W EIRP)
Multipoint Distribution Service (subpart K of part 21)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and power > 1640 W EIRP building-mounted antennas: power > 1640 W EIRP
Paging and Radiotelephone Service (subpart E of part 22)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and power > 1000 W ERP (1640 W EIRP) building-mounted antennas: power > 1000 W ERP (1640 W EIRP)
Cellular Radiotelephone Service (subpart H of part 22)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and total power of all channels > 1000 W ERP (1640 W EIRP) building-mounted antennas: total power of all channels > 1000 W ERP (1640 W EIRP)

TABLE 1 (cont.)

SERVICE (TITLE 47 CFR RULE PART)	EVALUATION REQUIRED IF:
Personal Communications Services (part 24)	(1) Narrowband PCS (subpart D): non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and total power of all channels > 1000 W ERP (1640 W EIRP) building-mounted antennas: total power of all channels > 1000 W ERP (1640 W EIRP) (2) Broadband PCS (subpart E): non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and total power of all channels > 2000 W ERP (3280 W EIRP) building-mounted antennas: total power of all channels > 2000 W ERP (3280 W EIRP)
Satellite Communications (part 25)	all included
General Wireless Communications Service (part 26)	total power of all channels > 1640 W EIRP
Wireless Communications Service (part 27)	total power of all channels > 1640 W EIRP
Radio Broadcast Services (part 73)	all included

TABLE 1 (cont.)

SERVICE (TITLE 47 CFR RULE PART)	EVALUATION REQUIRED IF:
Experimental, auxiliary, and special broadcast and other program distributional services (part 74)	subparts A, G, L: power > 100 W ERP subpart I: non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and power > 1640 W EIRP building-mounted antennas: power > 1640 W EIRP
Stations in the Maritime Services (part 80)	ship earth stations only
Private Land Mobile Radio Services Paging Operations (part 90)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and power > 1000 W ERP (1640 W EIRP) building-mounted antennas: power > 1000 W ERP (1640 W EIRP)
Private Land Mobile Radio Services Specialized Mobile Radio (part 90)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and total power of all channels > 1000 W ERP (1640 W EIRP) building-mounted antennas: total power of all channels > 1000 W ERP (1640 W EIRP)

TABLE 1 (cont.)

SERVICE (TITLE 47 CFR RULE PART)	EVALUATION REQUIRED IF:
Amateur Radio Service (part 97)	transmitter output power > levels specified in § 97.13(c)(1) of this chapter
Local Multipoint Distribution Service (subpart L of part 101)	non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and power > 1640 W EIRP building-mounted antennas: power > 1640 W EIRP LMDS licensees are required to attach a label to subscriber transceiver antennas that: (1) provides adequate notice regarding potential radiofrequency safety hazards, *e.g.,* information regarding the safe minimum separation distance required between users and transceiver antennas; and (2) references the applicable FCC-adopted limits for radiofrequency exposure specified in § 1.1310 of this chapter.

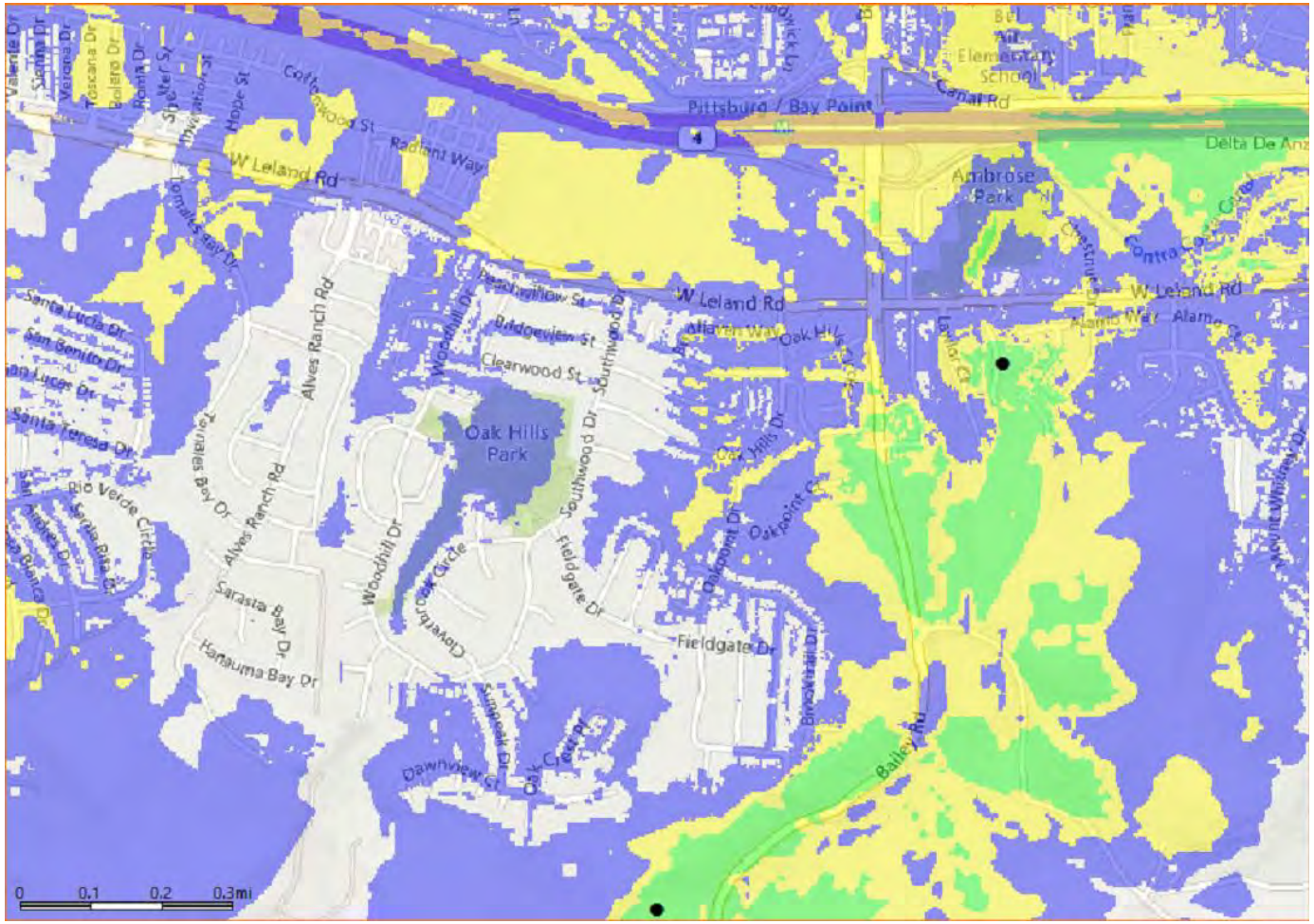
-end-

Propagation Map

CCL05107

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Existing LTE 1900 RSRP



Legend

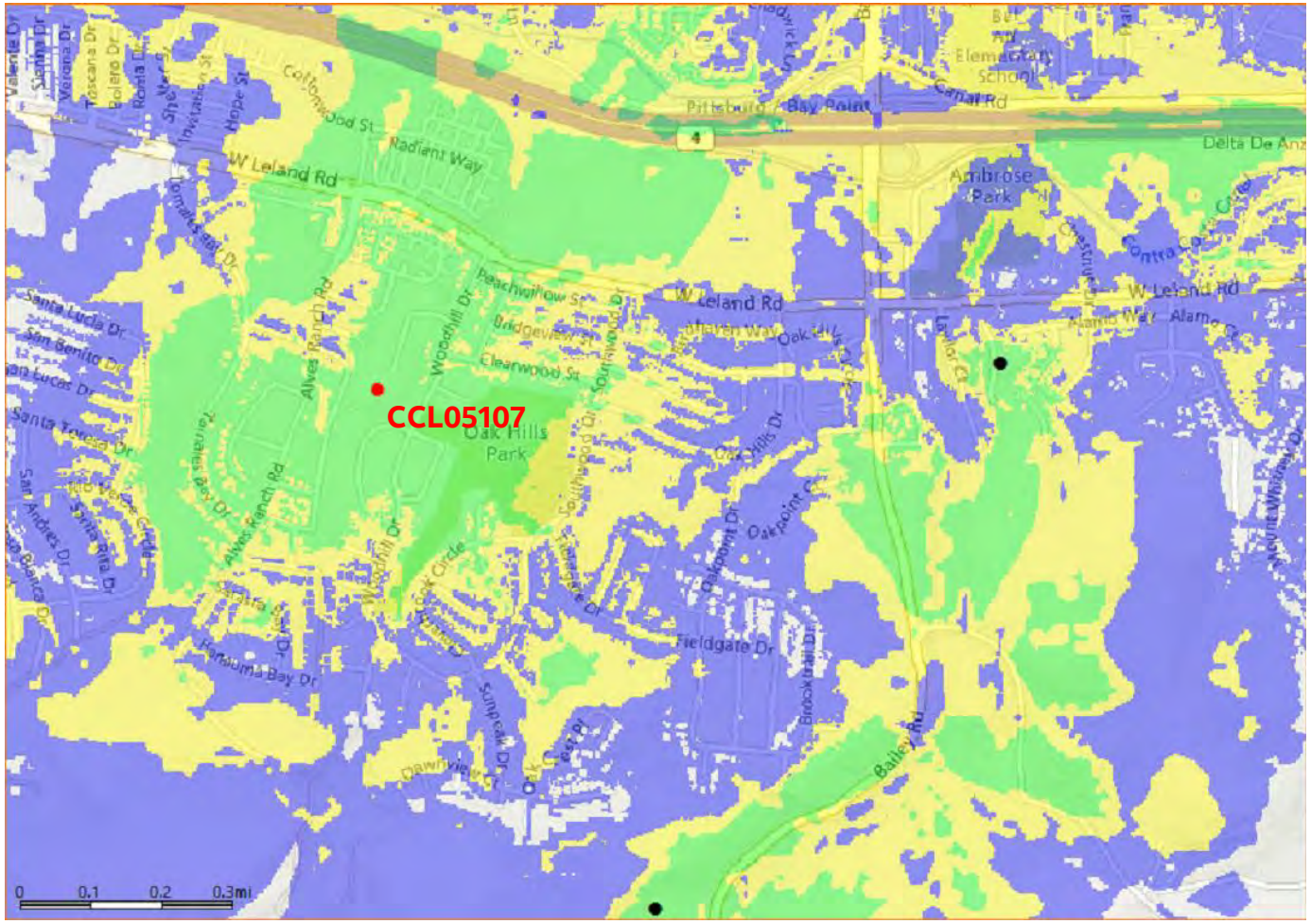
- Reliable Service Indoors/Outdoors
- Reliable Coverage in Transit
  Indoor Coverage Less Reliable
- Reliable Coverage Outdoors Only
  Indoor Coverage Less Reliable
- Existing site
- Proposed site

N

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AT&T

Proposed LTE 1900 RSRP with CCL05107



Legend

- Reliable Service Indoors/Outdoors
- Reliable Coverage in Transit
  Indoor Coverage Less Reliable
- Reliable Coverage Outdoors Only
  Indoor Coverage Less Reliable
- Existing site
- Proposed site

N

"AT&T PROPRIETARY -- This information constitutes confidential trade secrets and commercial or financial information owned by AT&T and is shared for Critical Infrastructure Protection purposes only. It is exempt from disclosure under the Freedom of Information Act (5 U.S.C. 552), Exemptions (b)(3)&(4), and its disclosure is prohibited under the Trade Secrets Act (18 U.S.C. 1905), the Critical Infrastructure Information Act of 2002, 6 U.S.C. § 133, and any State or local law requiring disclosure of information or records. This information must not be copied (whether mechanically or electronically through screen shots or other recording) or distributed to others not agreed upon by AT&T, but in all events do not copy or distribute to such others without notification pursuant to Executive Order 12600."

AT&T


AT&T

Alternative Sites Analysis
CCL05107

AT&T is seeking a site in this portion of Pittsburg to serve the Oak Hills community and Highway 4 corridor just west of Pittsburg Bart station. The following figure shows the general area AT&T radio frequency (RF) engineers identified to address the existing significant coverage gap.

The search area spans from two jurisdictions, City of Pittsburg and Concord. Initially, it covered a vacant area now being developed into a residential neighborhood. AT&T's goal is to extend coverage in this area, with a centerline height of 100-120 feet, adjustable based on the final location.

AT&T faced challenges with the original search ring (red outline), as large real estate developers owned it. Two rejected AT&T's proposals, and the other two did not respond, despite numerous attempts to outreach. Expanding the search ring westward did not help, as the new areas were still owned by the same developers (blue outline). AT&T Radio Frequency Engineers then directed us to a PG&E tower outside the original search ring to the north (green outline). Although accepted, the property was undeveloped, and the owner was not interested in providing easements. Additionally, the area was federally owned, complicating contact and response times. AT&T decided to pursue a neighboring PG&E tower, which already hosts other carriers and has open space.



The proposed location on Greenmeadow Circle was selected because it is separated by a 2-acre lot that currently houses two tall 90' PG&E lattice transformer towers which one currently have wireless antennas from another carrier. The facility will provide connecting coverage with other AT&T sites in the area that currently support the area that are currently over capacity and is causing the network to be 'stressed.'

Areas surrounding the third expanded search ring do not offer suitable tower placement as the neighborhood consists of residential homes that we would like to avoid yet serve as much as possible. This location has a large residential population of an estimated 3500 residents.

This PG&E collocation is the least intrusive option for addressing the existing significant coverage gap. The site has a well-maintained access road. See below detailed information on the additional candidates in the area and the reason why these candidates are not viable.

1. **Private Real Estate Investor Group A.**



a. Rosa Blanca Dr, Pittsburg, CA 94565. Assessors Map, Book 92, Page 1 N ½ SEC 22 T2N R1W MDBM.
b. Bailey Rd, Pittsburg, CA 94565. Assessors Map, Book 92, Page 2, POR SEC ¼ 21 & POR SW ¼ SEC 22 T2N R1W MDBM.
c. Bailey Rd. Pittsburg, CA 94565. Assessors Map, Book 92, Page 4, POR SEC 22,23,26,27 T2N R1W MDBM.
d. Bailey Rd, Pittsburg, CA 94565. Assessors Map, Book 92, Page 5, POR SEC 26, 27 T2N R1W MDBM.

AT&T evaluated the opportunity to partner with a private real estate group a in Pittsburg, an area currently in the early stages of development as a new residential neighborhood for approximately 1500 homes. AT&T reached out via U.S. Mail to initiate discussions but received confirmation that the landowners were not interested in pursuing collaboration. Therefore, this candidate is not feasible, as securing a willing landlord is essential for facility placement.

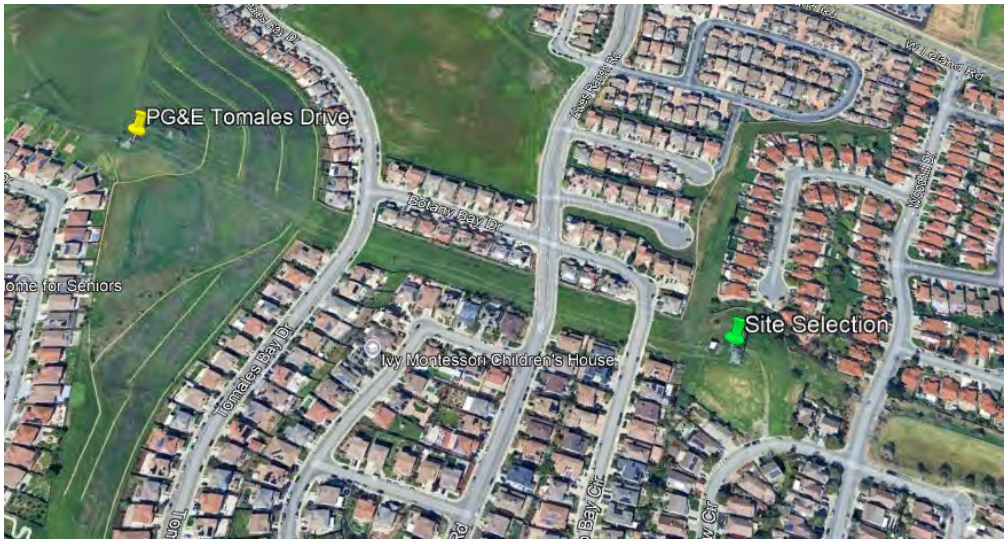
2. **Private Real Estate Investor Group B.**



Alves Ranch Rd, Pittsburg, CA 94565. Assessors Map Book 92, Page 1, N1/2 SEC 22 T2N R1W MDBM.

AT&T evaluated the opportunity to partner with a private real estate group b in Pittsburg, an area that is also currently in the early stages of development as a new residential neighborhood. AT&T reached out via U.S. Mail to initiate discussions but received confirmation. AT&T followed up after receiving no response but continued to receive a lack of interest from the landowners. This candidate is not feasible.

3. **PG&E Candidate – Tomales Bay Rd. APN 093-470-028.**



AT&T assessed a PG&E site as a potential candidate due to its zoning as Open Space (OS). This undeveloped land accommodates PG&E electrical towers and was selected by AT&T in 2023. However, during the initial efforts to secure interest, the landowner expressed unwillingness to participate in granting easements for site access. Furthermore, the required easement area falls under federal ownership, adding complexity to communication and delaying response times. This candidate is not feasible.

Universal Licensing System

ULS License

Cellular License - KNKN308 - AT&T Mobility Spectrum, LLC

This license has pending applications: 0010538588

Call Sign	KNKN308	Radio Service	CL - Cellular
Status	Active	Auth Type	Regular

Market

Market	CMA527 - Montana 5 - Mineral	Channel Block	A (View Frequencies)
Submarket	0	Phase	2

Dates

Grant	10/20/2020	Expiration	10/01/2030
Effective	01/24/2024	Cancellation	

Five Year Buildout Date

03/26/1996

ECIP Information

ECIP Flag

Small Carrier or Tribal Nation Transaction	Rural-Focused Transaction

ECIP Dates

5-Year Holding Period Begins	5-Year Holding Period Ends

Required Operational Filing Dates

IORN Operation Begin Date	FORN Deadline Date	FORN Filed Date

Control Points

1	18 W. GRANITE, BUTTE, MT
2	2000 COBURN ROAD, BILLINGS, MT

Licensee

FRN	0014980726 (View Ownership Filing)	Type	Limited Liability Company

Licensee

AT&T Mobility Spectrum, LLC
208 S Akard St, 20F

P:(855)699-7073
F:(214)746-6410

Dallas, TX 75202
ATTN National Regulatory Compliance
E:FCCMW@att.com

Contact

AT&T Services, Inc.
Jessica J Dunk
208 S Akard St, 20F
Dallas, TX 75202
ATTN NRC
P:(855)699-7073
F:(214)746-6410
E:FCCMW@att.com

Ownership and Qualifications

Radio Service Type	Mobile		
Regulatory Status	Common Carrier	Interconnected	Yes

Alien Ownership
The Applicant answered "No" to each of the Alien Ownership questions.

Basic Qualifications
The Applicant answered "No" to each of the Basic Qualification questions.

Demographics

Race

Ethnicity

Gender

LETTER OF AUTHORIZATION

To: City of Pittsburg Community Development Department

Subject: Application for Constructing a Telecommunications Facility

Property: 107 Greenmeadow Circle, Pittsburg, CA 94565

West Coast Homebuilders, Inc. as property owner located at 107 Greenmeadow Circle, Pittsburg, California APN 096-320-068 ("Owner"), does hereby give this one-time authorization to New Cingular Wireless, PCS, LLC dba AT&T Mobility ("Tenant") and it's agents New Cingular Wireless, PCS, LLC c/o Complete Wireless Consulting to act as its agent for the limited purpose of applying for and obtaining from the City of Pittsburg any permit or other necessary governmental requirement to construct improvements to the property to be leased to them by Owner for the purpose of constructing, operating and maintaining a telecommunications facility. The improvements to the property shall be done in accordance with the plans dated January 23, 2025 (Sheets T-1.1 through E-1.1) entitled *AT&T Site Number: CCL05107, AT&T Site Name: OAK HILLS* prepared by Complete Wireless Consulting, Inc.. Owner understands that the application may be denied, modified or approved with conditions and that such condition or modifications must be complied with prior to building permit issuance. Any conditions or modifications will be binding on Tenant and will not be binding on Owner.

This authorization is for the plans and work referred to above. Any modifications to the above-referenced plans and/or any modifications or expansion to the work identified.in said plans requires the additional, subsequent prior written approval of Owner.

Signature of Property Owner or Representative

West Coast Homebuilders, Inc.
By: Douglas W. Messner, Authorized Agent
Printed Name of Property Owner or Representative

Date:

Owner Contact Information:

Phone: (925) 609-6200 (Attn: Douglas W. Messner)

Email: dmessner@spprop.com

Preferred method of communication: Email

SBA Communications Corporation
8051 Congress Avenue
Boca Raton, FL 33487-1307

T + 561.995.7670
F + 561.995.7626

sbasite.com

LETTER OF AUTHORIZATION

SBA Site ID: CA1AFEF-L, PITTSBURG-MARTINEZ #1 006/030 / Hunting

Property Located at: 38 Beechwood Court, Pittsburg, CA, 94565

THE CITY/COUNTY OF: Pittsburg / Contra Costa

APPLICATION FOR ZONING/USE/BUILDING PERMIT

This letter authorizes AT&T and its authorized agents to file for all necessary zoning, planning and building permits (local, state and federal) for the purposes of installing, operating and maintaining a telecommunications facility on the existing tower on the property referenced above on behalf of Pacific Gas & Electric Co.

All approval conditions that may be granted to AT&T in connection with above referenced facility relating to this specific application are the sole responsibility of AT&T.

Golden State Licensing, LLC

Donald Day

Executive VP, Site Leasing

Date: 2/04/2025

Design Review for a Wireless Telecommunications Facility
New Cingular Wireless PCS, LLC. (d/b/a AT&T)

Site Name: CCL05107 – Oak Hills
Site Address: 107 Green Meadow Circle, Pittsburg, CA 94565
APN: 093-320-065-5

March 26th, 2024

Applicant Agent:
Complete Wireless Consulting – Steve Proo
2009 V Street
Sacramento, CA 95818
916-838-6713
sproo@completewireless.net

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Exhibits

A. Site Plans
B. Appendix A - Radio Frequency
C. Coverage Maps
D. Alternative Sites Analysis
E. FCC License Approval
F. Letter of Authorization

General Information

Owner:	West Coast Home Builders, Inc. 4021 Port Chicago Highway, Concord, CA 94520
Tower Owner:	Pacific Gas & Electric Company 245 Market Street San Francisco, CA 94105
Site Address:	107 Greenmeadow Circle Pittsburg, CA 94565
Applicant:	New Cingular Wireless, PCS, LLC. 2009 V Street Sacramento, CA 95818
APN #:	093-320-068-5
Coordinates:	38.013735 -121.954716
Parcel Area:	2 Acres
Zoning:	PD – Planned Development
Request:	Design Review for a wireless telecommunications facility collocated onto an existing PG&E tower.
Project Agent:	Complete Wireless Consulting 2009 V Street Sacramento, CA 95818
Contact:	Steve Proo 916-838-6713 sproo@completewireless.net

Project Overview

Complete Wireless Consulting is submitting a Design Review application for the collocation of a new wireless telecommunications facility on behalf of New Cingular Wireless, PCS, LLC (d/b/a AT&T) and the property owner, West Coast Home Builders, Inc. This facility aims to address a significant gap in coverage and capacity for AT&T customers in the Pittsburg community and enhance coverage along Highway 4.

AT&T plans to collocate on an existing 94-foot PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8-foot fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas.

A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added. For equipment specifications, please refer to the site plans, Exhibit A.

West Coast Home Builders, Inc. owns the 2-acre parcel, which is accessible from Green meadow Circle via an existing gravel path to the PG&E towers. This proposed site is unmanned and requires no on-site personnel. Visitation to the site by a service technician for routine maintenance may occur up to once per month.

The proposed site is entirely self-monitored and connected directly to the central office, where sophisticated computers alert personnel to any equipment malfunction. Because the wireless facility is unmanned, there are no regular hours of operation and no impact on existing local traffic patterns. No water or sanitation services are required. The facility itself operates 24/7. Unless tower lighting is required by the Federal Aviation Administration (FAA), the only lighting on the facility will be shielded lights inside the lease area for safety.

The construction of the facility will comply with all local rules and regulations. The crew size will range from two to ten individuals. The construction phase of the project will last approximately two months and will not exceed acceptable noise levels.

Coverage Needs

AT&T constructs wireless communication facilities at carefully selected locations. The need for service was determined by market demand, coverage, capacity requirements for a specific geographic area, and the need to provide continuous coverage from one site to another. AT&T Radio Frequency (RF) Coverage Analysis is attached as Exhibit B.

The following factors are considered when identifying the need and location of a new wireless facility.

Coverage. An antenna site must be located where the radio frequency broadcasts provide adequate coverage within any significant coverage gap. The RF engineer must consider the coverage objectives for the site and the terrain in and around the area to be covered. Since radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas, placing an antenna site near the center of the desired coverage area is generally best. However, in some instances, the search ring may be located away from the center of the desired coverage area due to the existing coverage, the surrounding terrain, or other features that might affect the radio frequency broadcasts, like buildings or sources of electrical interference.

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To analyze network design, AT&T uses a proprietary Radio Frequency prediction tool to predict the signal strength and analyze our network design. The colors represent the Reference Signal Received Power (RSRP), which measures signal strength and quality.

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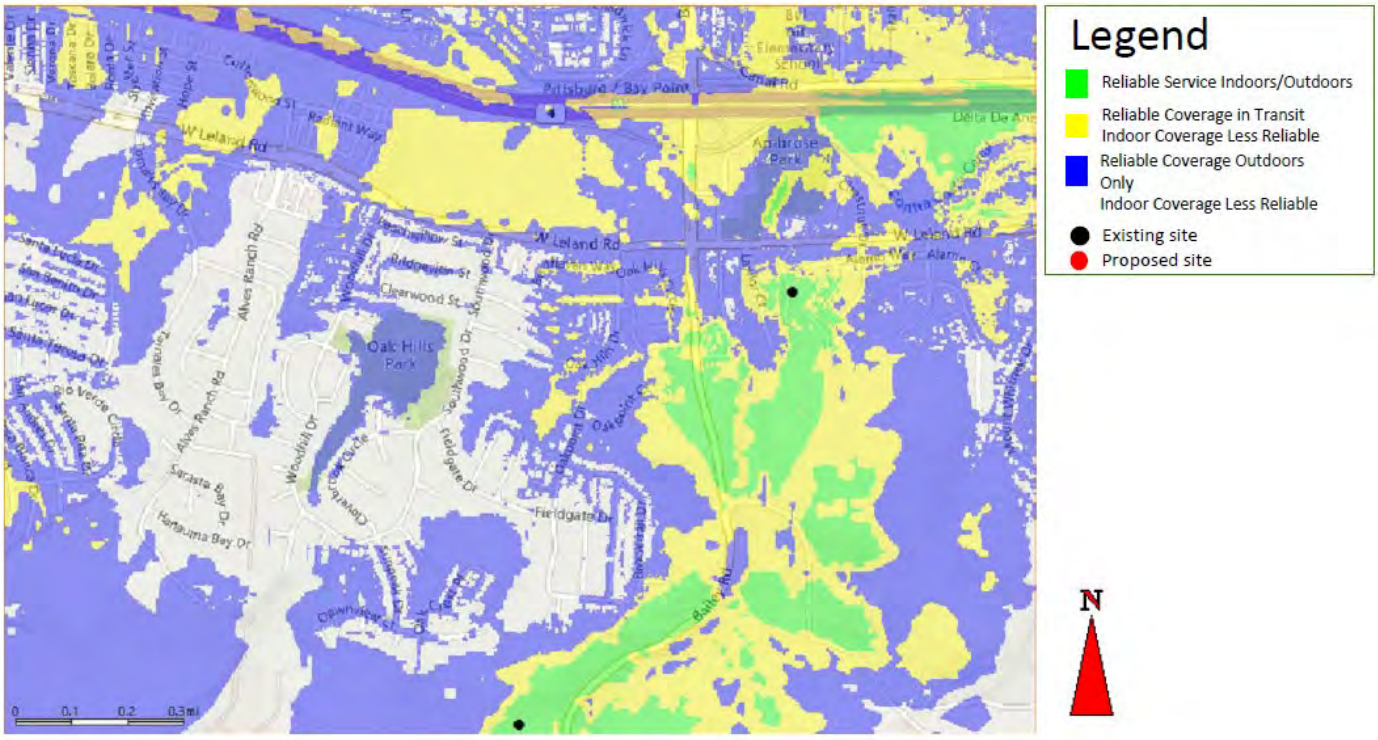
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Blue: until -113 dBm. This signal threshold represents a signal quality that is unreliable when making and/or holding a call. Terribly slow latency and data speeds. Both outdoor and indoor QOS will be unreliable.

The coverage plot shown below shows a significant coverage gap in this community of Pittsburg and large stretches of the Highway 4 corridor. A larger coverage map has been included with this application Exhibit C.

COMPLETE
Wireless Consulting, Inc.

Existing LTE 1900 RSRP



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The search area spans from two jurisdictions, City of Pittsburg and Concord. Initially, it covered a vacant area now being developed into a residential neighborhood. AT&T's goal is to extend coverage in this area, with a centerline height of 100-120 feet, adjustable based on the final location.

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The proposed location on Greenmeadow Circle was selected because it is separated by a 2-acre lot that currently houses two tall 90' PG&E lattice transformer towers which one currently have wireless antennas from another carrier. The facility will provide connecting coverage with other AT&T sites in the area that currently support the area that are currently over capacity and is causing the network to be 'stressed.'

Areas surrounding the third expanded search ring do not offer suitable tower placement as the neighborhood consists of residential homes that we would like to avoid yet serve as much as possible. This location has a large residential population of an estimated 3500 residents.

This PG&E collocation is the least intrusive option for addressing the existing significant coverage gap. The site has a well-maintained access road. For additional information, See Exhibit D, Alternative Sites Analysis

Proposed Site Location

Street View



Aerial View



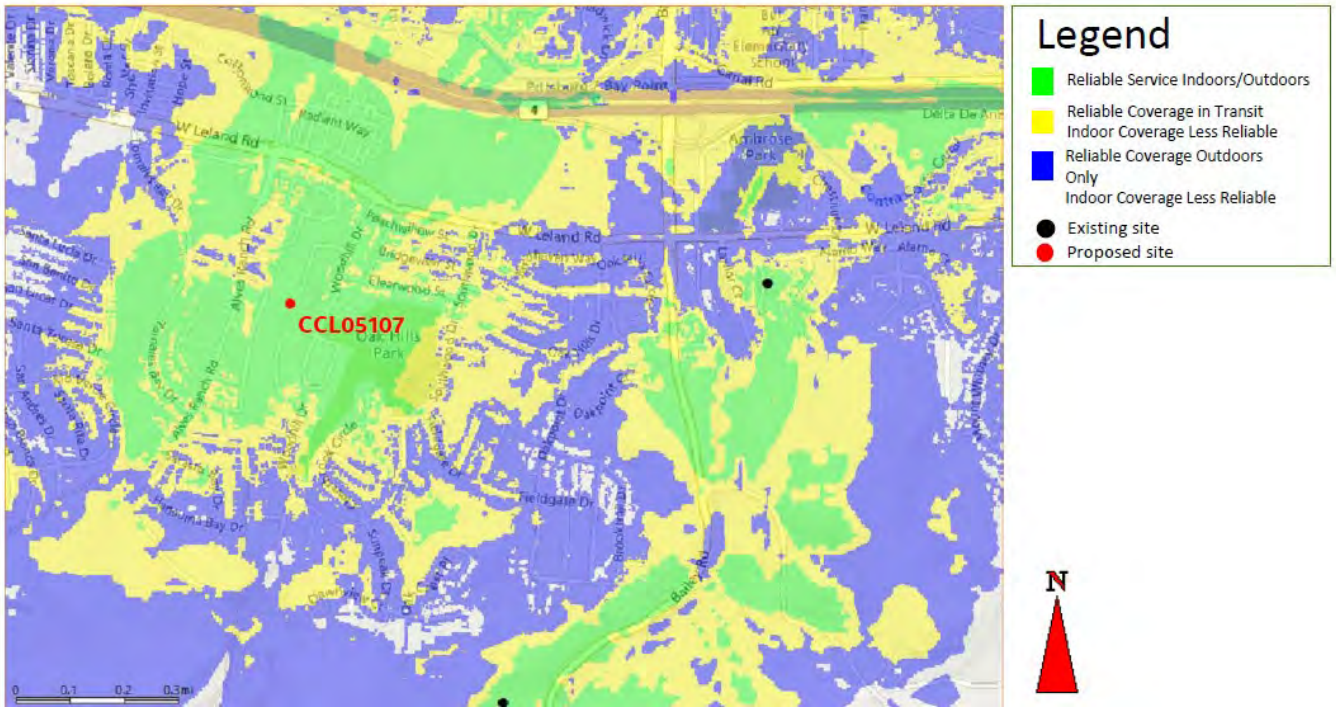
Equipment Lease Area



Projected Coverage

As shown in the provided coverage plot below, the proposed site will address an existing significant coverage gap in AT&T's regional wireless voice and data network. The proposed location will provide seamless coverage and communication with other AT&T towers nearby. This integrated network helps maintain consistent service quality for users in the region. Larger portions of the coverage maps have been included in this application, Exhibit C.

Proposed LTE 1900 RSRP with CCL05107



Applicable Regulations

The proposal is subject to the provisions of the City of Pittsburg land use regulations, including regulations for wireless facilities (Article 20 of the Zoning code, beginning at Sec. 18.84.925) and Design Review requirements (Article 3, beginning at Sec.18.36.210).

Article 20 Wireless Telecommunication Facilities

Sec.18.84.925 Application Requirements

1. A fully dimensioned site plan, plans, and elevations drawn to scale, prepared by a California-licensed engineer or architect showing any existing wireless facilities with all existing transmission equipment and other improvements, the proposed facility with all proposed transmission equipment and other improvements and the legal boundaries of the leased or owned area surrounding the proposed facility and any associated access or utility easements. The site plans must include descriptions and physical dimensions for all existing transmission equipment, if any, and all proposed transmission equipment to be installed.

   Response: The applicant has included site plans with the above requirements. See Exhibit A

2. Visual impact demonstrations using photographic simulations of the proposed facility in context of the site as it would be seen from reasonable line-of-sight locations from residential areas, public rights-of-way, public parks, and/or other sites as deemed appropriate by the city planner, together with a map that shows the photo location of each view angle.

   Response: The applicant has provided some pictures of the facility. Pleas provide a notice of incomplete should the city like additional photos.

3. A written description of the proposed approach for screening or camouflaging all facilities from public view, including plans for installation and maintenance of landscaping, sample exterior materials and colors, and an explanation of the measures by which the proposed facility would be camouflaged or rendered not readily visible. Where any part of the proposed facility would be readily visible, the application shall include a written explanation as to why it cannot or would not appropriately be screened or camouflaged from public view.

   Response: AT&T proposes collocating on an existing 94' PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8' fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas. A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional

camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

4. The applicant must provide a list of all existing structures considered as alternatives to the proposed location, together with a general description of the site design considered at each location. The applicant must also provide a written explanation as to why the alternatives considered were unacceptable or infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. This explanation must include a meaningful comparative analysis and such technical information and other factual justification as are necessary to document the reasons why each alternative is unacceptable, infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. If an existing facility is listed among the alternatives, the applicant must specifically address why the modification of such wireless communication facility is not a viable option. When an applicant proposes a site in the public right-of-way, the initial alternative sites analysis required for a complete application may evaluate other potential locations and designs in the right-of-way.

   Response: The applicant has provided an Alternative Sites Analysis with this application. See Exhibit D.

5. Copies of, or a sworn statement by, an authorized representative that applicant holds all applicable licenses or other approvals required by the Federal Communications Commission (FCC), the California Public Utilities Commission (PUC), and any other agency of the federal or state government with authority to regulate wireless telecommunications facilities that are required in order for the applicant to construct the proposed facility, and that applicant is in compliance with all conditions imposed in conjunction with such licenses or approvals.

   Response: The applicant has provided an FCC confirmation form that AT&T is licensed. See Exhibit F.

6. A written statement that includes: (a) a description of the technical objectives to be achieved; (b) an annotated topographical map that identifies the targeted service area to be benefited; (c) the estimated number of potentially affected users in the targeted service area; and (d) full-color signal propagation maps with objective units of signal strength measurement that show the applicant's current service coverage levels from all adjacent sites without the proposed site, predicted service coverage levels from all adjacent sites with the proposed site, and predicted service coverage levels from the proposed site without all adjacent sites.

   Response: The applicant has provided a written explanation of the above requirements as part of this application. Please refer to pages 4-9, coverage needs along with current and proposed coverage maps. See Exhibit C for coverage maps.

7. A radio frequency (RF) report acceptable to the city prepared and certified by an RF engineer that certifies that the proposed facility, as well as any collocated facilities, will comply with applicable federal RF exposure standards and exposure limits. The RF report must include the actual frequency and power levels (in watts ERP) for all existing and proposed antennas at the site and exhibits that show the location and orientation of all transmitting antennas and the boundaries of areas with RF exposures in excess of the uncontrolled/general population limit (as that term is defined by the FCC) and also the boundaries of areas with RF exposures in excess of the controlled/occupational limit (as that term is defined by the FCC). Each such boundary shall be clearly marked and identified for every transmitting antenna at the project site.

   Response: The applicant has provided an Appendix A document (Exhibit B) with this application.

8. A fully completed and executed application form as required by the city, as may be amended or updated from time to time. The applicant must state the approval it seeks (i.e., design review or minor modification pursuant to Section 6409(a))

   Response: The applicant is submitting a Design Review application for collocation to an existing structure for the addition of wireless antennas.

9. An application fee established by the city, as may be amended or updated from time to time.

   Response: The applicant is prepared to pay all fees associated with this Design Review Planning Application.

10. A cash or other sufficient deposit tendered by the applicant to the city for any third-party peer review determined by the city to be necessary to ensure compliance with the requirements of this article.

    Response: The applicant requests to be notified in writing if any additional studies are required. Furthermore, the applicant asks to be informed whether these studies will be conducted by the applicant or the City of Pittsburg before any study commences.

Article 3: Design Review in Land Use in Land Use Districts Other Than Single Family Residential.

Sec.18.36.210(A-G) Required information for application under PMC 18.36.200.

A. Site plan showing:

1. General location of property; 2. Property boundaries; 3. Existing topography and proposed grading (for property no less than 10 acres, a contour interval no greater than five feet and a horizontal map scale of one inch equals 50 feet or larger shall be used; for property larger than 10 acres, a contour interval no greater than 10 feet and a horizontal map scale of one inch equals 100 feet or larger shall be used); 4. All existing and proposed structures, the height of each structure and number of dwelling units in each structure; 5. All existing and proposed signs; 6. Location and approximate height of all adjacent structures on abutting sites; 7. Location, dimensions and quantity of existing and proposed off-street parking, with a statement indicating whether it conforms to applicable regulations; 8. Existing and proposed vehicular and pedestrian ways, and trails, with grades, widths and types of improvements; 9. Proposed vehicular access between site and public street; 10. Locations, names and widths of abutting streets; 11. Existing and proposed utilities; 12. Existing and proposed recreational facilities; 13. Existing and proposed storm drainage facilities; 14. Location of existing trees on the site;15. Locations and heights of existing and proposed retaining walls; 16. Locations and dimensions of trash disposal areas;17. Roof overhangs; 18. Distances between buildings and from building walls to property lines; 19. Proposed street names; 20. Handicap facilities;

B. Architectural drawings showing:

1. Floor plans at one-eighth inch or one-quarter inch equals one foot zero inches.
2. Four elevations (or more if necessary) to include all sides of development at no less than one-eighth inch equals one foot zero inches.

Response: The applicant has included all applicable information in the site plans. See Exhibit A.

C. Landscaping plan, including plant names and sizes, and an irrigation plan.

Response: Due to the industrial design of the PG&E tower, additional camouflage is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

D. A recent photograph of the site itself and of adjacent properties showing the current condition of the properties.

Response: The applicant has provided photo simulations of the project.

E. Color and texture chips of actual samples of materials.

Response: Due to the industrial design of the PG&E tower, the applicant asks for a color sample to be waived.

F. Additional information which may be requested by the planning commission including but not limited to the following:

1. Recent photographs of sight line profiles in sufficiently large scale, taken from commonly used vantage points in the city (shopping centers, road intersections, scenic lookouts, etc.) with the outline of the proposed structure in proper scale and perspective superimposed on it.

2. Architectural drawings showing the locations, size, color, shape, and type of illumination of each proposed sign.

G. Other information as determined by the city planner. [Ord. 07-1284 § 3 (Exh. C), 2007; Ord. 979 § 2 (Exh. A), 1990.]

Response to F & G: The applicant respectfully requests that any additional items or information required by the planning commission or city planner be communicated through a Notice of Incomplete (NOI) in accordance with the FCC 90-day shot clock as outlined in the Spectrum Act. This will ensure timely and efficient processing of the application.

Notice of Actions Affecting This Design Review Permit

In accordance with California Government Code Section 65945(a), The applicant requests notice of any proposal to adopt or amend the: general plan, specific plan, zoning ordinance, ordinance(s) affecting building or grading permits that would in any manner affect this development permit. Any such notice may be sent to 2009 V Street, Sacramento, CA 95818. Attn: Steve Proo.

Thank you,

Steve Proo
Planning Specialist – Land Use Development
Complete Wireless Consulting
sproo@completewireless.net
Cell – 916-838-6713

Design Review for a Wireless Telecommunications Facility
New Cingular Wireless PCS, LLC. (d/b/a AT&T)

Site Name: CCL05107 – Oak Hills
Site Address: 107 Green Meadow Circle, Pittsburg, CA 94565
APN: 093-320-065-5

March 26th, 2024

Applicant Agent:
Complete Wireless Consulting – Steve Proo
2009 V Street
Sacramento, CA 95818
916-838-6713
sproo@completewireless.net

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Exhibits

A. Site Plans
B. Appendix A - Radio Frequency
C. Coverage Maps
D. Alternative Sites Analysis
E. FCC License Approval
F. Letter of Authorization

General Information

Owner:	West Coast Home Builders, Inc. 4021 Port Chicago Highway, Concord, CA 94520
Tower Owner:	Pacific Gas & Electric Company 245 Market Street San Francisco, CA 94105
Site Address:	107 Greenmeadow Circle Pittsburg, CA 94565
Applicant:	New Cingular Wireless, PCS, LLC. 2009 V Street Sacramento, CA 95818
APN #:	093-320-068-5
Coordinates:	38.013735 -121.954716
Parcel Area:	2 Acres
Zoning:	PD – Planned Development
Request:	Design Review for a wireless telecommunications facility collocated onto an existing PG&E tower.
Project Agent:	Complete Wireless Consulting 2009 V Street Sacramento, CA 95818
Contact:	Steve Proo 916-838-6713 sproo@completewireless.net

Project Overview

Complete Wireless Consulting is submitting a Design Review application for the collocation of a new wireless telecommunications facility on behalf of New Cingular Wireless, PCS, LLC (d/b/a AT&T) and the property owner, West Coast Home Builders, Inc. This facility aims to address a significant gap in coverage and capacity for AT&T customers in the Pittsburg community and enhance coverage along Highway 4.

AT&T plans to collocate on an existing 94-foot PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8-foot fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas.

A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added. For equipment specifications, please refer to the site plans, Exhibit A.

West Coast Home Builders, Inc. owns the 2-acre parcel, which is accessible from Green meadow Circle via an existing gravel path to the PG&E towers. This proposed site is unmanned and requires no on-site personnel. Visitation to the site by a service technician for routine maintenance may occur up to once per month.

The proposed site is entirely self-monitored and connected directly to the central office, where sophisticated computers alert personnel to any equipment malfunction. Because the wireless facility is unmanned, there are no regular hours of operation and no impact on existing local traffic patterns. No water or sanitation services are required. The facility itself operates 24/7. Unless tower lighting is required by the Federal Aviation Administration (FAA), the only lighting on the facility will be shielded lights inside the lease area for safety.

The construction of the facility will comply with all local rules and regulations. The crew size will range from two to ten individuals. The construction phase of the project will last approximately two months and will not exceed acceptable noise levels.

Coverage Needs

AT&T constructs wireless communication facilities at carefully selected locations. The need for service was determined by market demand, coverage, capacity requirements for a specific geographic area, and the need to provide continuous coverage from one site to another. AT&T Radio Frequency (RF) Coverage Analysis is attached as Exhibit B.

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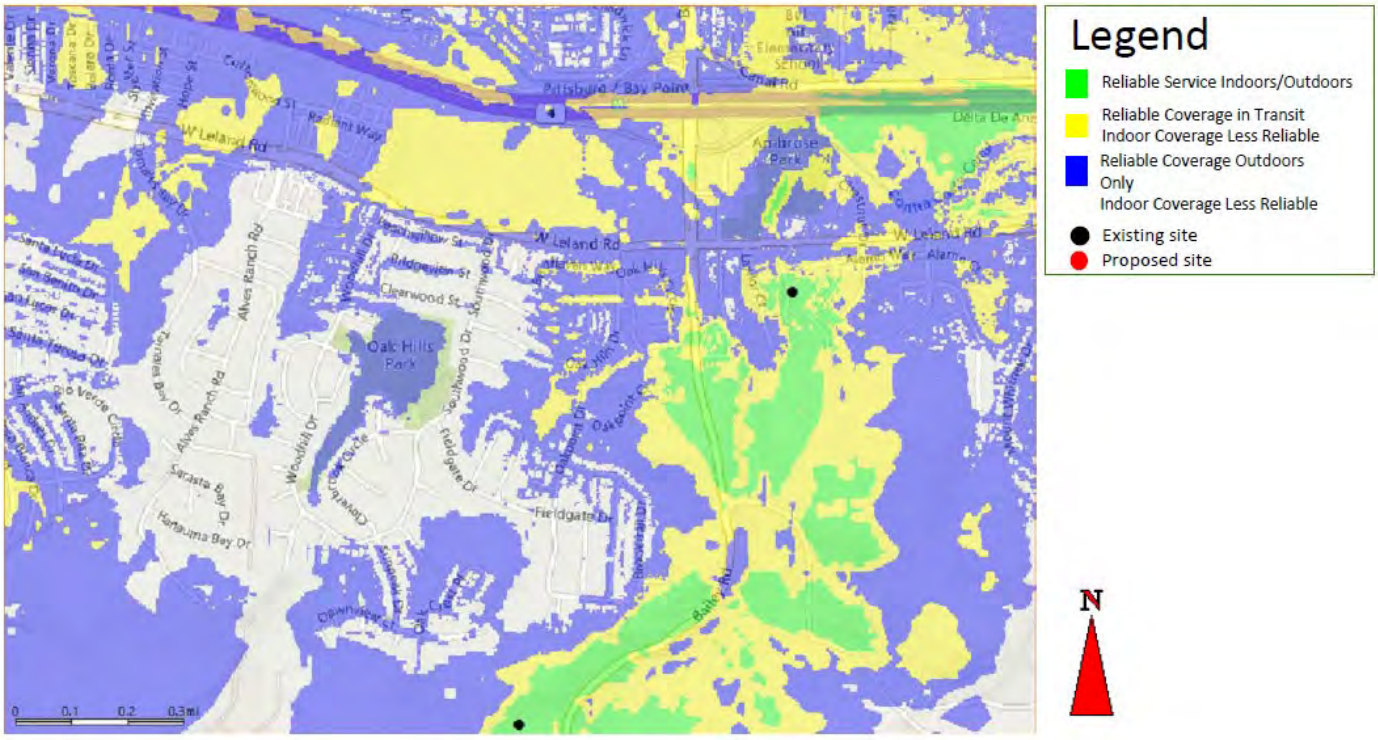
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COMPLETE
Wireless Consulting, Inc.

Existing LTE 1900 RSRP



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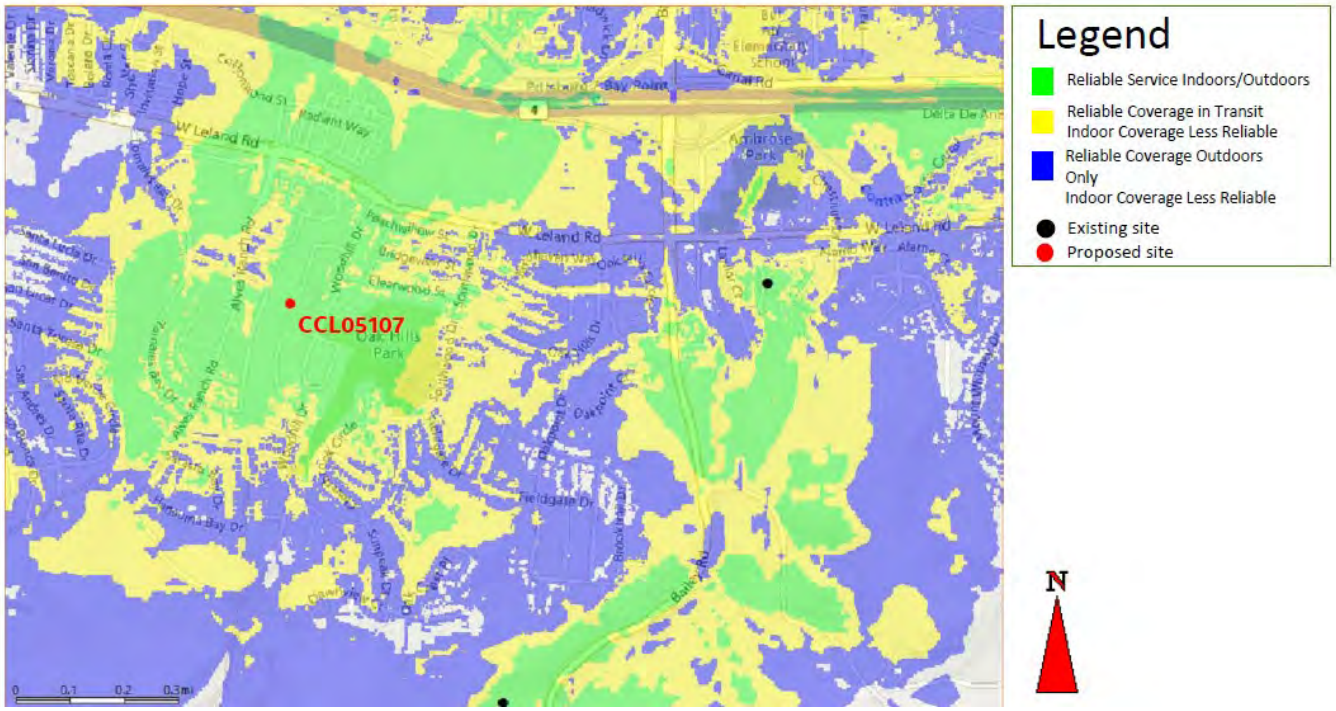
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Proposed LTE 1900 RSRP with CCL05107



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Article 20 Wireless Telecommunication Facilities

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6. A written statement that includes: (a) a description of the technical objectives to be achieved; (b) an annotated topographical map that identifies the targeted service area to be benefited; (c) the estimated number of potentially affected users in the targeted service area; and (d) full-color signal propagation maps with objective units of signal strength measurement that show the applicant's current service coverage levels from all adjacent sites without the proposed site, predicted service coverage levels from all adjacent sites with the proposed site, and predicted service coverage levels from the proposed site without all adjacent sites.

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7. A radio frequency (RF) report acceptable to the city prepared and certified by an RF engineer that certifies that the proposed facility, as well as any collocated facilities, will comply with applicable federal RF exposure standards and exposure limits. The RF report must include the actual frequency and power levels (in watts ERP) for all existing and proposed antennas at the site and exhibits that show the location and orientation of all transmitting antennas and the boundaries of areas with RF exposures in excess of the uncontrolled/general population limit (as that term is defined by the FCC) and also the boundaries of areas with RF exposures in excess of the controlled/occupational limit (as that term is defined by the FCC). Each such boundary shall be clearly marked and identified for every transmitting antenna at the project site.

   Response: The applicant has provided an Appendix A document (Exhibit B) with this application.

8. A fully completed and executed application form as required by the city, as may be amended or updated from time to time. The applicant must state the approval it seeks (i.e., design review or minor modification pursuant to Section 6409(a))

   Response: The applicant is submitting a Design Review application for collocation to an existing structure for the addition of wireless antennas.

9. An application fee established by the city, as may be amended or updated from time to time.

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10. A cash or other sufficient deposit tendered by the applicant to the city for any third-party peer review determined by the city to be necessary to ensure compliance with the requirements of this article.

    Response: The applicant requests to be notified in writing if any additional studies are required. Furthermore, the applicant asks to be informed whether these studies will be conducted by the applicant or the City of Pittsburg before any study commences.

Article 3: Design Review in Land Use in Land Use Districts Other Than Single Family Residential.

Sec.18.36.210(A-G) Required information for application under PMC 18.36.200.

A. Site plan showing:

1. General location of property; 2. Property boundaries; 3. Existing topography and proposed grading (for property no less than 10 acres, a contour interval no greater than five feet and a horizontal map scale of one inch equals 50 feet or larger shall be used; for property larger than 10 acres, a contour interval no greater than 10 feet and a horizontal map scale of one inch equals 100 feet or larger shall be used); 4. All existing and proposed structures, the height of each structure and number of dwelling units in each structure; 5. All existing and proposed signs; 6. Location and approximate height of all adjacent structures on abutting sites; 7. Location, dimensions and quantity of existing and proposed off-street parking, with a statement indicating whether it conforms to applicable regulations; 8. Existing and proposed vehicular and pedestrian ways, and trails, with grades, widths and types of improvements; 9. Proposed vehicular access between site and public street; 10. Locations, names and widths of abutting streets; 11. Existing and proposed utilities; 12. Existing and proposed recreational facilities; 13. Existing and proposed storm drainage facilities; 14. Location of existing trees on the site;15. Locations and heights of existing and proposed retaining walls; 16. Locations and dimensions of trash disposal areas;17. Roof overhangs; 18. Distances between buildings and from building walls to property lines; 19. Proposed street names; 20. Handicap facilities;

B. Architectural drawings showing:

1. Floor plans at one-eighth inch or one-quarter inch equals one foot zero inches.
2. Four elevations (or more if necessary) to include all sides of development at no less than one-eighth inch equals one foot zero inches.

Response: The applicant has included all applicable information in the site plans. See Exhibit A.

C. Landscaping plan, including plant names and sizes, and an irrigation plan.

Response: Due to the industrial design of the PG&E tower, additional camouflage is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

D. A recent photograph of the site itself and of adjacent properties showing the current condition of the properties.

Response: The applicant has provided photo simulations of the project.

E. Color and texture chips of actual samples of materials.

Response: Due to the industrial design of the PG&E tower, the applicant asks for a color sample to be waived.

F. Additional information which may be requested by the planning commission including but not limited to the following:

1. Recent photographs of sight line profiles in sufficiently large scale, taken from commonly used vantage points in the city (shopping centers, road intersections, scenic lookouts, etc.) with the outline of the proposed structure in proper scale and perspective superimposed on it.

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G. Other information as determined by the city planner. [Ord. 07-1284 § 3 (Exh. C), 2007; Ord. 979 § 2 (Exh. A), 1990.]

Response to F & G: The applicant respectfully requests that any additional items or information required by the planning commission or city planner be communicated through a Notice of Incomplete (NOI) in accordance with the FCC 90-day shot clock as outlined in the Spectrum Act. This will ensure timely and efficient processing of the application.

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In accordance with California Government Code Section 65945(a), The applicant requests notice of any proposal to adopt or amend the: general plan, specific plan, zoning ordinance, ordinance(s) affecting building or grading permits that would in any manner affect this development permit. Any such notice may be sent to 2009 V Street, Sacramento, CA 95818. Attn: Steve Proo.

Thank you,

Steve Proo
Planning Specialist – Land Use Development
Complete Wireless Consulting
sproo@completewireless.net
Cell – 916-838-6713

Design Review for a Wireless Telecommunications Facility
New Cingular Wireless PCS, LLC. (d/b/a AT&T)

Site Name: CCL05107 – Oak Hills
Site Address: 107 Green Meadow Circle, Pittsburg, CA 94565
APN: 093-320-065-5

March 26th, 2024

Applicant Agent:
Complete Wireless Consulting – Steve Proo
2009 V Street
Sacramento, CA 95818
916-838-6713
sproo@completewireless.net

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Exhibits

A. Site Plans
B. Appendix A - Radio Frequency
C. Coverage Maps
D. Alternative Sites Analysis
E. FCC License Approval
F. Letter of Authorization

General Information

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Applicant:	New Cingular Wireless, PCS, LLC. 2009 V Street Sacramento, CA 95818
APN #:	093-320-068-5
Coordinates:	38.013735 -121.954716
Parcel Area:	2 Acres
Zoning:	PD – Planned Development
Request:	Design Review for a wireless telecommunications facility collocated onto an existing PG&E tower.
Project Agent:	Complete Wireless Consulting 2009 V Street Sacramento, CA 95818
Contact:	Steve Proo 916-838-6713 sproo@completewireless.net

Project Overview

Complete Wireless Consulting is submitting a Design Review application for the collocation of a new wireless telecommunications facility on behalf of New Cingular Wireless, PCS, LLC (d/b/a AT&T) and the property owner, West Coast Home Builders, Inc. This facility aims to address a significant gap in coverage and capacity for AT&T customers in the Pittsburg community and enhance coverage along Highway 4.

AT&T plans to collocate on an existing 94-foot PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8-foot fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas.

A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added. For equipment specifications, please refer to the site plans, Exhibit A.

West Coast Home Builders, Inc. owns the 2-acre parcel, which is accessible from Green meadow Circle via an existing gravel path to the PG&E towers. This proposed site is unmanned and requires no on-site personnel. Visitation to the site by a service technician for routine maintenance may occur up to once per month.

The proposed site is entirely self-monitored and connected directly to the central office, where sophisticated computers alert personnel to any equipment malfunction. Because the wireless facility is unmanned, there are no regular hours of operation and no impact on existing local traffic patterns. No water or sanitation services are required. The facility itself operates 24/7. Unless tower lighting is required by the Federal Aviation Administration (FAA), the only lighting on the facility will be shielded lights inside the lease area for safety.

The construction of the facility will comply with all local rules and regulations. The crew size will range from two to ten individuals. The construction phase of the project will last approximately two months and will not exceed acceptable noise levels.

Coverage Needs

AT&T constructs wireless communication facilities at carefully selected locations. The need for service was determined by market demand, coverage, capacity requirements for a specific geographic area, and the need to provide continuous coverage from one site to another. AT&T Radio Frequency (RF) Coverage Analysis is attached as Exhibit B.

The following factors are considered when identifying the need and location of a new wireless facility.

Coverage. An antenna site must be located where the radio frequency broadcasts provide adequate coverage within any significant coverage gap. The RF engineer must consider the coverage objectives for the site and the terrain in and around the area to be covered. Since radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas, placing an antenna site near the center of the desired coverage area is generally best. However, in some instances, the search ring may be located away from the center of the desired coverage area due to the existing coverage, the surrounding terrain, or other features that might affect the radio frequency broadcasts, like buildings or sources of electrical interference.

Capacity. Capacity refers to the technological limitation of a wireless communication facility to provide communication. Mobile phones and wireless devices transmit to and receive radio frequency signals from antennas at wireless communication facilities. Antennas can transmit and receive a finite amount of signal – the capacity. When capacity is reached, busy signals on phones result, and data transmission is lost. Monitoring of each wireless facility is continuous, and the data collected is analyzed for planning to prevent overloading. Projections based on the data allow AT&Ts to plan, design, permit, and construct new facilities or modify existing wireless communication facilities before reaching or exceeding capacity, which can result in a loss of coverage.

Clutter. AT&T's antennas must "clear the clutter" in the area. Trees, buildings, and other natural and built obstacles adversely affect the radio frequencies used in AT&T systems. Radio frequencies do not penetrate mountains, hills, rocks, or metal. Therefore, antennas must be installed above the "clutter" to provide high-quality communications services in the desired coverage areas. In addition, if the local code requires us to accommodate additional carriers on the structure, the structure must be even higher to allow the other carriers' antennas to clear the clutter.

Call Handoff. The antenna site must be located where the radio broadcasts from this site will allow seamless call handoff with adjacent sites. "Call handoff" is a feature of a wireless communications system that allows an ongoing telephone conversation to continue uninterrupted as the user travels from the coverage area of one antenna site into the coverage area of an adjacent antenna site. This requires coverage overlapping for a sufficient distance and time to support the handoff mechanism.

Quality of Service. Wireless communications users want to use their services where they live, work, commute, and play, including indoors. AT&T's coverage objectives include providing indoor coverage in areas with residences, businesses, and indoor recreational facilities.

Radio Frequencies Used by System. The designs of telecommunications systems will vary significantly based on the radio frequencies used by the carrier. If the carrier uses radio frequencies in the 850 to 950 MHz range, the radio signals will travel further and penetrate buildings better than the radio frequencies in the 1900 MHz band. Thus, AT&T needs more antennas in a given area to support technologies that use the 1900 M.

Current Coverage

To analyze network design, AT&T uses a proprietary Radio Frequency prediction tool to predict the signal strength and analyze our network design. The colors represent the Reference Signal Received Power (RSRP), which measures signal strength and quality.

Green: until -90 dBm. This signal threshold represents a level of service adequate for providing reliable coverage inside a building. It provides good indoor and outdoor service.

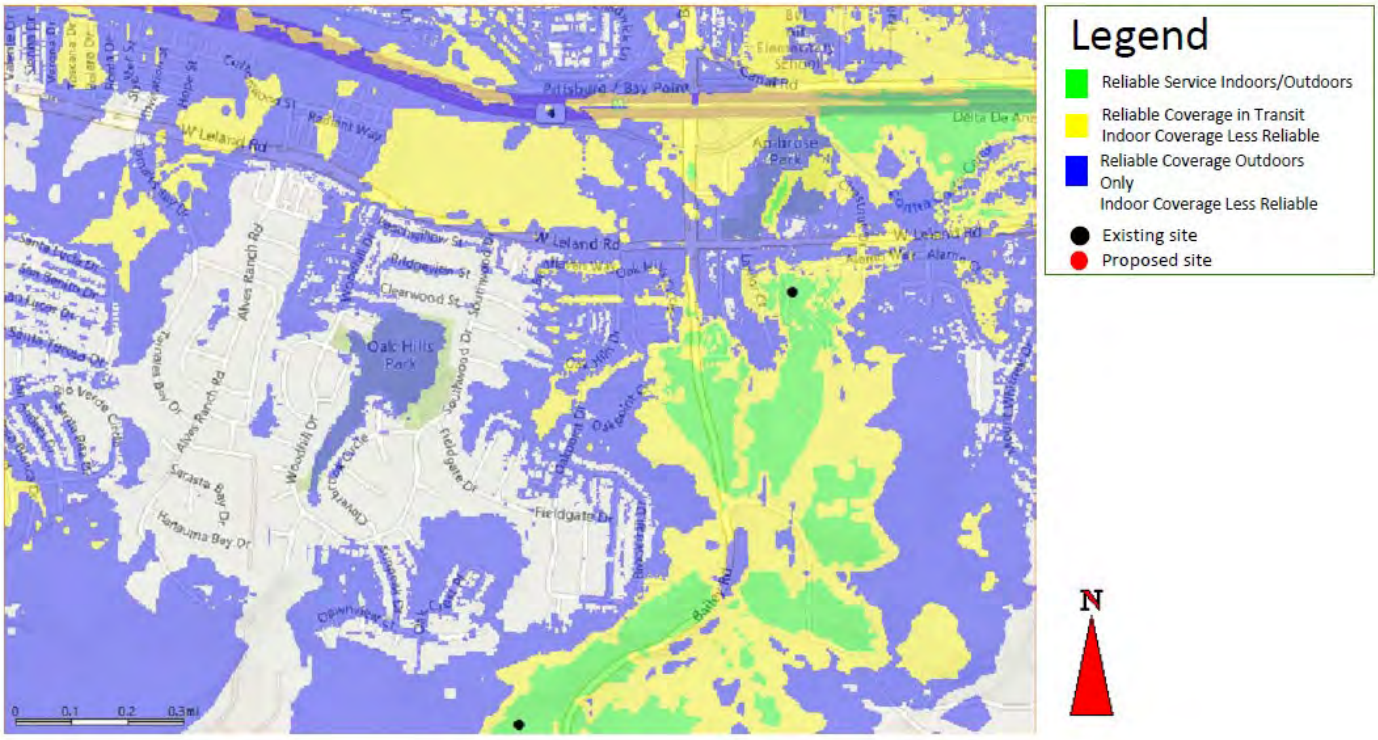
Yellow: until -100 dBm. This signal threshold represents a level of service adequate for providing reliable coverage outdoors or inside a car, but indoor or in-building coverage is unreliable. It provides good outdoor and in-car service but inadequate indoor service as QOS will be (or start getting) hampered.

Blue: until -113 dBm. This signal threshold represents a signal quality that is unreliable when making and/or holding a call. Terribly slow latency and data speeds. Both outdoor and indoor QOS will be unreliable.

The coverage plot shown below shows a significant coverage gap in this community of Pittsburg and large stretches of the Highway 4 corridor. A larger coverage map has been included with this application Exhibit C.

COMPLETE
Wireless Consulting, Inc.

Existing LTE 1900 RSRP



Site Selection

AT&T is seeking a site in this portion of Pittsburg to serve the Oak Hills community and Highway 4 corridor just west of Pittsburg Bart station. The following figure shows the general area AT&T radio frequency (RF) engineers identified to address the existing significant coverage gap.

The search area spans from two jurisdictions, City of Pittsburg and Concord. Initially, it covered a vacant area now being developed into a residential neighborhood. AT&T's goal is to extend coverage in this area, with a centerline height of 100-120 feet, adjustable based on the final location.

AT&T faced challenges with the original search ring (red outline), as large real estate developers owned it. Two rejected AT&T's proposals, and the other two did not respond, despite numerous attempts to outreach. Expanding the search ring westward did not help, as the new areas were still owned by the same developers (blue outline). AT&T Radio Frequency Engineers then directed us to a PG&E tower outside the original search ring to the north (green outline). Although accepted, the property was undeveloped, and the owner was not interested in providing easements. Additionally, the area was federally owned, complicating contact and response times. AT&T decided to pursue a neighboring PG&E tower, which already hosts other carriers and has open space.



The proposed location on Greenmeadow Circle was selected because it is separated by a 2-acre lot that currently houses two tall 90' PG&E lattice transformer towers which one currently have wireless antennas from another carrier. The facility will provide connecting coverage with other AT&T sites in the area that currently support the area that are currently over capacity and is causing the network to be 'stressed.'

Areas surrounding the third expanded search ring do not offer suitable tower placement as the neighborhood consists of residential homes that we would like to avoid yet serve as much as possible. This location has a large residential population of an estimated 3500 residents.

This PG&E collocation is the least intrusive option for addressing the existing significant coverage gap. The site has a well-maintained access road. For additional information, See Exhibit D, Alternative Sites Analysis

Proposed Site Location

Street View



Aerial View



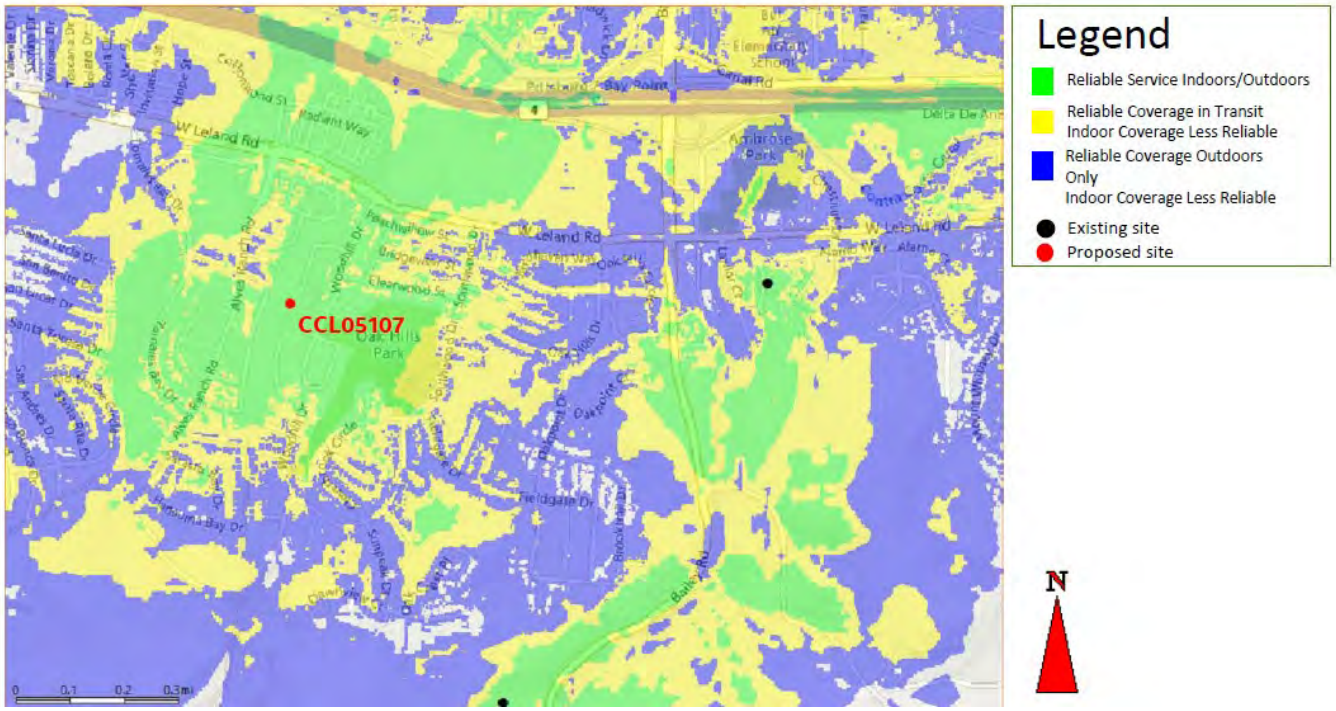
Equipment Lease Area



Projected Coverage

As shown in the provided coverage plot below, the proposed site will address an existing significant coverage gap in AT&T's regional wireless voice and data network. The proposed location will provide seamless coverage and communication with other AT&T towers nearby. This integrated network helps maintain consistent service quality for users in the region. Larger portions of the coverage maps have been included in this application, Exhibit C.

Proposed LTE 1900 RSRP with CCL05107



Applicable Regulations

The proposal is subject to the provisions of the City of Pittsburg land use regulations, including regulations for wireless facilities (Article 20 of the Zoning code, beginning at Sec. 18.84.925) and Design Review requirements (Article 3, beginning at Sec.18.36.210).

Article 20 Wireless Telecommunication Facilities

Sec.18.84.925 Application Requirements

1. A fully dimensioned site plan, plans, and elevations drawn to scale, prepared by a California-licensed engineer or architect showing any existing wireless facilities with all existing transmission equipment and other improvements, the proposed facility with all proposed transmission equipment and other improvements and the legal boundaries of the leased or owned area surrounding the proposed facility and any associated access or utility easements. The site plans must include descriptions and physical dimensions for all existing transmission equipment, if any, and all proposed transmission equipment to be installed.

   Response: The applicant has included site plans with the above requirements. See Exhibit A

2. Visual impact demonstrations using photographic simulations of the proposed facility in context of the site as it would be seen from reasonable line-of-sight locations from residential areas, public rights-of-way, public parks, and/or other sites as deemed appropriate by the city planner, together with a map that shows the photo location of each view angle.

   Response: The applicant has provided some pictures of the facility. Pleas provide a notice of incomplete should the city like additional photos.

3. A written description of the proposed approach for screening or camouflaging all facilities from public view, including plans for installation and maintenance of landscaping, sample exterior materials and colors, and an explanation of the measures by which the proposed facility would be camouflaged or rendered not readily visible. Where any part of the proposed facility would be readily visible, the application shall include a written explanation as to why it cannot or would not appropriately be screened or camouflaged from public view.

   Response: AT&T proposes collocating on an existing 94' PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8' fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas. A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional

camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

4. The applicant must provide a list of all existing structures considered as alternatives to the proposed location, together with a general description of the site design considered at each location. The applicant must also provide a written explanation as to why the alternatives considered were unacceptable or infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. This explanation must include a meaningful comparative analysis and such technical information and other factual justification as are necessary to document the reasons why each alternative is unacceptable, infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. If an existing facility is listed among the alternatives, the applicant must specifically address why the modification of such wireless communication facility is not a viable option. When an applicant proposes a site in the public right-of-way, the initial alternative sites analysis required for a complete application may evaluate other potential locations and designs in the right-of-way.

   Response: The applicant has provided an Alternative Sites Analysis with this application. See Exhibit D.

5. Copies of, or a sworn statement by, an authorized representative that applicant holds all applicable licenses or other approvals required by the Federal Communications Commission (FCC), the California Public Utilities Commission (PUC), and any other agency of the federal or state government with authority to regulate wireless telecommunications facilities that are required in order for the applicant to construct the proposed facility, and that applicant is in compliance with all conditions imposed in conjunction with such licenses or approvals.

   Response: The applicant has provided an FCC confirmation form that AT&T is licensed. See Exhibit F.

6. A written statement that includes: (a) a description of the technical objectives to be achieved; (b) an annotated topographical map that identifies the targeted service area to be benefited; (c) the estimated number of potentially affected users in the targeted service area; and (d) full-color signal propagation maps with objective units of signal strength measurement that show the applicant's current service coverage levels from all adjacent sites without the proposed site, predicted service coverage levels from all adjacent sites with the proposed site, and predicted service coverage levels from the proposed site without all adjacent sites.

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Capacity. Capacity refers to the technological limitation of a wireless communication facility to provide communication. Mobile phones and wireless devices transmit to and receive radio frequency signals from antennas at wireless communication facilities. Antennas can transmit and receive a finite amount of signal – the capacity. When capacity is reached, busy signals on phones result, and data transmission is lost. Monitoring of each wireless facility is continuous, and the data collected is analyzed for planning to prevent overloading. Projections based on the data allow AT&Ts to plan, design, permit, and construct new facilities or modify existing wireless communication facilities before reaching or exceeding capacity, which can result in a loss of coverage.

Clutter. AT&T's antennas must "clear the clutter" in the area. Trees, buildings, and other natural and built obstacles adversely affect the radio frequencies used in AT&T systems. Radio frequencies do not penetrate mountains, hills, rocks, or metal. Therefore, antennas must be installed above the "clutter" to provide high-quality communications services in the desired coverage areas. In addition, if the local code requires us to accommodate additional carriers on the structure, the structure must be even higher to allow the other carriers' antennas to clear the clutter.

Call Handoff. The antenna site must be located where the radio broadcasts from this site will allow seamless call handoff with adjacent sites. "Call handoff" is a feature of a wireless communications system that allows an ongoing telephone conversation to continue uninterrupted as the user travels from the coverage area of one antenna site into the coverage area of an adjacent antenna site. This requires coverage overlapping for a sufficient distance and time to support the handoff mechanism.

Quality of Service. Wireless communications users want to use their services where they live, work, commute, and play, including indoors. AT&T's coverage objectives include providing indoor coverage in areas with residences, businesses, and indoor recreational facilities.

Radio Frequencies Used by System. The designs of telecommunications systems will vary significantly based on the radio frequencies used by the carrier. If the carrier uses radio frequencies in the 850 to 950 MHz range, the radio signals will travel further and penetrate buildings better than the radio frequencies in the 1900 MHz band. Thus, AT&T needs more antennas in a given area to support technologies that use the 1900 M.

Current Coverage

To analyze network design, AT&T uses a proprietary Radio Frequency prediction tool to predict the signal strength and analyze our network design. The colors represent the Reference Signal Received Power (RSRP), which measures signal strength and quality.

Green: until -90 dBm. This signal threshold represents a level of service adequate for providing reliable coverage inside a building. It provides good indoor and outdoor service.

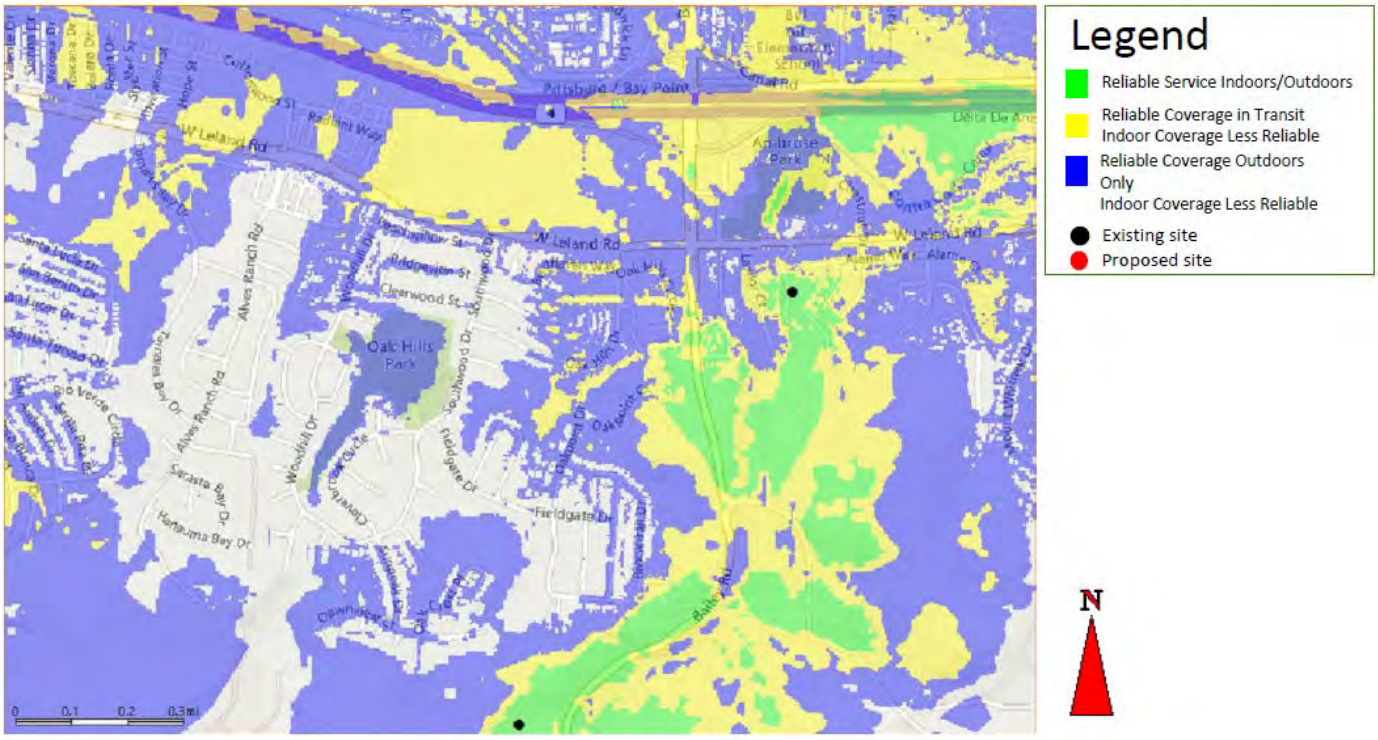
Yellow: until -100 dBm. This signal threshold represents a level of service adequate for providing reliable coverage outdoors or inside a car, but indoor or in-building coverage is unreliable. It provides good outdoor and in-car service but inadequate indoor service as QOS will be (or start getting) hampered.

Blue: until -113 dBm. This signal threshold represents a signal quality that is unreliable when making and/or holding a call. Terribly slow latency and data speeds. Both outdoor and indoor QOS will be unreliable.

The coverage plot shown below shows a significant coverage gap in this community of Pittsburg and large stretches of the Highway 4 corridor. A larger coverage map has been included with this application Exhibit C.

COMPLETE
Wireless Consulting, Inc.

Existing LTE 1900 RSRP



Site Selection

AT&T is seeking a site in this portion of Pittsburg to serve the Oak Hills community and Highway 4 corridor just west of Pittsburg Bart station. The following figure shows the general area AT&T radio frequency (RF) engineers identified to address the existing significant coverage gap.

The search area spans from two jurisdictions, City of Pittsburg and Concord. Initially, it covered a vacant area now being developed into a residential neighborhood. AT&T's goal is to extend coverage in this area, with a centerline height of 100-120 feet, adjustable based on the final location.

AT&T faced challenges with the original search ring (red outline), as large real estate developers owned it. Two rejected AT&T's proposals, and the other two did not respond, despite numerous attempts to outreach. Expanding the search ring westward did not help, as the new areas were still owned by the same developers (blue outline). AT&T Radio Frequency Engineers then directed us to a PG&E tower outside the original search ring to the north (green outline). Although accepted, the property was undeveloped, and the owner was not interested in providing easements. Additionally, the area was federally owned, complicating contact and response times. AT&T decided to pursue a neighboring PG&E tower, which already hosts other carriers and has open space.



The proposed location on Greenmeadow Circle was selected because it is separated by a 2-acre lot that currently houses two tall 90' PG&E lattice transformer towers which one currently have wireless antennas from another carrier. The facility will provide connecting coverage with other AT&T sites in the area that currently support the area that are currently over capacity and is causing the network to be 'stressed.'

Areas surrounding the third expanded search ring do not offer suitable tower placement as the neighborhood consists of residential homes that we would like to avoid yet serve as much as possible. This location has a large residential population of an estimated 3500 residents.

This PG&E collocation is the least intrusive option for addressing the existing significant coverage gap. The site has a well-maintained access road. For additional information, See Exhibit D, Alternative Sites Analysis

Proposed Site Location

Street View



Aerial View



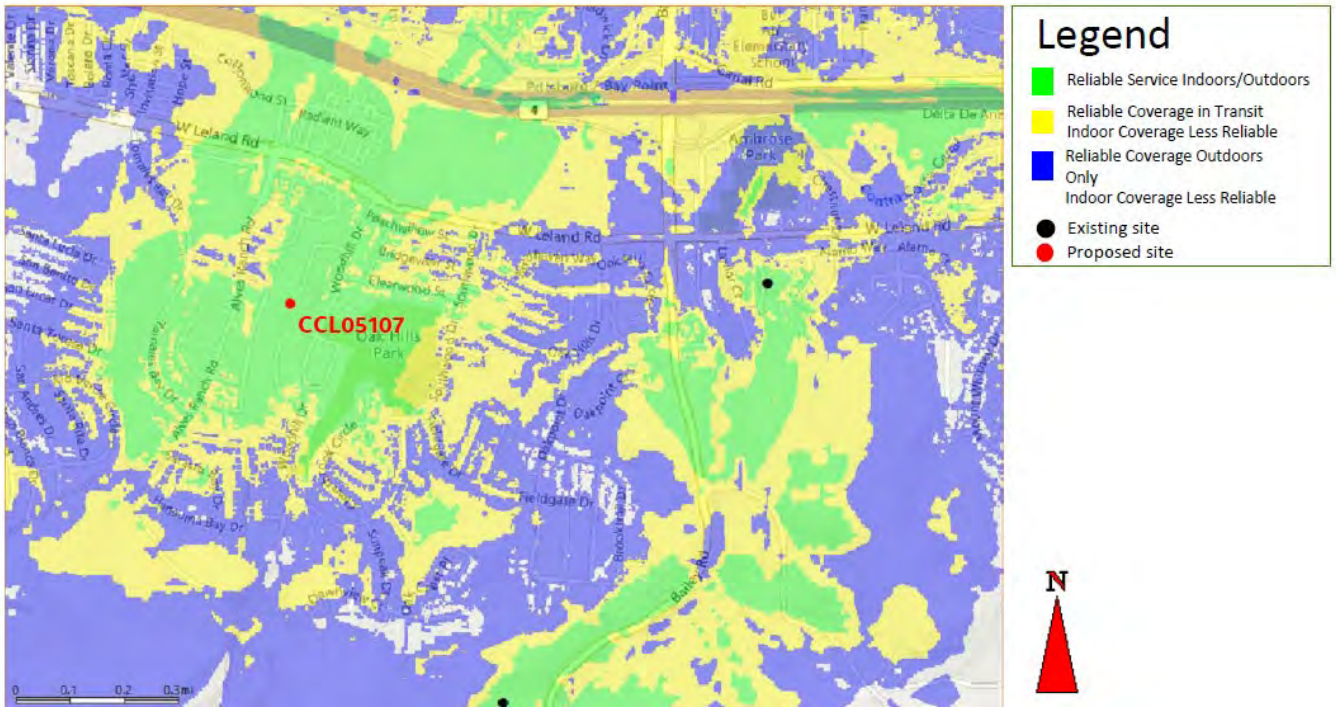
Equipment Lease Area



Projected Coverage

As shown in the provided coverage plot below, the proposed site will address an existing significant coverage gap in AT&T's regional wireless voice and data network. The proposed location will provide seamless coverage and communication with other AT&T towers nearby. This integrated network helps maintain consistent service quality for users in the region. Larger portions of the coverage maps have been included in this application, Exhibit C.

Proposed LTE 1900 RSRP with CCL05107



Applicable Regulations

The proposal is subject to the provisions of the City of Pittsburg land use regulations, including regulations for wireless facilities (Article 20 of the Zoning code, beginning at Sec. 18.84.925) and Design Review requirements (Article 3, beginning at Sec.18.36.210).

Article 20 Wireless Telecommunication Facilities

Sec.18.84.925 Application Requirements

1. A fully dimensioned site plan, plans, and elevations drawn to scale, prepared by a California-licensed engineer or architect showing any existing wireless facilities with all existing transmission equipment and other improvements, the proposed facility with all proposed transmission equipment and other improvements and the legal boundaries of the leased or owned area surrounding the proposed facility and any associated access or utility easements. The site plans must include descriptions and physical dimensions for all existing transmission equipment, if any, and all proposed transmission equipment to be installed.

   Response: The applicant has included site plans with the above requirements. See Exhibit A

2. Visual impact demonstrations using photographic simulations of the proposed facility in context of the site as it would be seen from reasonable line-of-sight locations from residential areas, public rights-of-way, public parks, and/or other sites as deemed appropriate by the city planner, together with a map that shows the photo location of each view angle.

   Response: The applicant has provided some pictures of the facility. Pleas provide a notice of incomplete should the city like additional photos.

3. A written description of the proposed approach for screening or camouflaging all facilities from public view, including plans for installation and maintenance of landscaping, sample exterior materials and colors, and an explanation of the measures by which the proposed facility would be camouflaged or rendered not readily visible. Where any part of the proposed facility would be readily visible, the application shall include a written explanation as to why it cannot or would not appropriately be screened or camouflaged from public view.

   Response: AT&T proposes collocating on an existing 94' PG&E lattice tower within a 15'-7" x 15'-10" (247 sq ft) lease area beneath the tower, which will house the cooling cabinets and associated equipment. This project will not include an emergency standby generator. The 8' fiberglass fence will match the brown coloring of the existing lease area of the nearby PG&E tower, which currently supports other wireless antennas. A total of nine antennas will be installed at heights ranging from 34 to 47 feet. These antennas will blend seamlessly with the existing PG&E lattice tower. Due to the industrial design of the PG&E tower, additional

camouflaging is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

4. The applicant must provide a list of all existing structures considered as alternatives to the proposed location, together with a general description of the site design considered at each location. The applicant must also provide a written explanation as to why the alternatives considered were unacceptable or infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. This explanation must include a meaningful comparative analysis and such technical information and other factual justification as are necessary to document the reasons why each alternative is unacceptable, infeasible, unavailable, or not as consistent with the development standards in this article as the proposed location. If an existing facility is listed among the alternatives, the applicant must specifically address why the modification of such wireless communication facility is not a viable option. When an applicant proposes a site in the public right-of-way, the initial alternative sites analysis required for a complete application may evaluate other potential locations and designs in the right-of-way.

   Response: The applicant has provided an Alternative Sites Analysis with this application. See Exhibit D.

5. Copies of, or a sworn statement by, an authorized representative that applicant holds all applicable licenses or other approvals required by the Federal Communications Commission (FCC), the California Public Utilities Commission (PUC), and any other agency of the federal or state government with authority to regulate wireless telecommunications facilities that are required in order for the applicant to construct the proposed facility, and that applicant is in compliance with all conditions imposed in conjunction with such licenses or approvals.

   Response: The applicant has provided an FCC confirmation form that AT&T is licensed. See Exhibit F.

6. A written statement that includes: (a) a description of the technical objectives to be achieved; (b) an annotated topographical map that identifies the targeted service area to be benefited; (c) the estimated number of potentially affected users in the targeted service area; and (d) full-color signal propagation maps with objective units of signal strength measurement that show the applicant's current service coverage levels from all adjacent sites without the proposed site, predicted service coverage levels from all adjacent sites with the proposed site, and predicted service coverage levels from the proposed site without all adjacent sites.

   Response: The applicant has provided a written explanation of the above requirements as part of this application. Please refer to pages 4-9, coverage needs along with current and proposed coverage maps. See Exhibit C for coverage maps.

7. A radio frequency (RF) report acceptable to the city prepared and certified by an RF engineer that certifies that the proposed facility, as well as any collocated facilities, will comply with applicable federal RF exposure standards and exposure limits. The RF report must include the actual frequency and power levels (in watts ERP) for all existing and proposed antennas at the site and exhibits that show the location and orientation of all transmitting antennas and the boundaries of areas with RF exposures in excess of the uncontrolled/general population limit (as that term is defined by the FCC) and also the boundaries of areas with RF exposures in excess of the controlled/occupational limit (as that term is defined by the FCC). Each such boundary shall be clearly marked and identified for every transmitting antenna at the project site.

   Response: The applicant has provided an Appendix A document (Exhibit B) with this application.

8. A fully completed and executed application form as required by the city, as may be amended or updated from time to time. The applicant must state the approval it seeks (i.e., design review or minor modification pursuant to Section 6409(a))

   Response: The applicant is submitting a Design Review application for collocation to an existing structure for the addition of wireless antennas.

9. An application fee established by the city, as may be amended or updated from time to time.

   Response: The applicant is prepared to pay all fees associated with this Design Review Planning Application.

10. A cash or other sufficient deposit tendered by the applicant to the city for any third-party peer review determined by the city to be necessary to ensure compliance with the requirements of this article.

    Response: The applicant requests to be notified in writing if any additional studies are required. Furthermore, the applicant asks to be informed whether these studies will be conducted by the applicant or the City of Pittsburg before any study commences.

Article 3: Design Review in Land Use in Land Use Districts Other Than Single Family Residential.

Sec.18.36.210(A-G) Required information for application under PMC 18.36.200.

A. Site plan showing:

1. General location of property; 2. Property boundaries; 3. Existing topography and proposed grading (for property no less than 10 acres, a contour interval no greater than five feet and a horizontal map scale of one inch equals 50 feet or larger shall be used; for property larger than 10 acres, a contour interval no greater than 10 feet and a horizontal map scale of one inch equals 100 feet or larger shall be used); 4. All existing and proposed structures, the height of each structure and number of dwelling units in each structure; 5. All existing and proposed signs; 6. Location and approximate height of all adjacent structures on abutting sites; 7. Location, dimensions and quantity of existing and proposed off-street parking, with a statement indicating whether it conforms to applicable regulations; 8. Existing and proposed vehicular and pedestrian ways, and trails, with grades, widths and types of improvements; 9. Proposed vehicular access between site and public street; 10. Locations, names and widths of abutting streets; 11. Existing and proposed utilities; 12. Existing and proposed recreational facilities; 13. Existing and proposed storm drainage facilities; 14. Location of existing trees on the site;15. Locations and heights of existing and proposed retaining walls; 16. Locations and dimensions of trash disposal areas;17. Roof overhangs; 18. Distances between buildings and from building walls to property lines; 19. Proposed street names; 20. Handicap facilities;

B. Architectural drawings showing:

1. Floor plans at one-eighth inch or one-quarter inch equals one foot zero inches.
2. Four elevations (or more if necessary) to include all sides of development at no less than one-eighth inch equals one foot zero inches.

Response: The applicant has included all applicable information in the site plans. See Exhibit A.

C. Landscaping plan, including plant names and sizes, and an irrigation plan.

Response: Due to the industrial design of the PG&E tower, additional camouflage is not necessary, as the structure naturally integrates with the existing tower infrastructure. Consequently, no additional landscaping will be added.

D. A recent photograph of the site itself and of adjacent properties showing the current condition of the properties.

Response: The applicant has provided photo simulations of the project.

E. Color and texture chips of actual samples of materials.

Response: Due to the industrial design of the PG&E tower, the applicant asks for a color sample to be waived.

F. Additional information which may be requested by the planning commission including but not limited to the following:

1. Recent photographs of sight line profiles in sufficiently large scale, taken from commonly used vantage points in the city (shopping centers, road intersections, scenic lookouts, etc.) with the outline of the proposed structure in proper scale and perspective superimposed on it.

2. Architectural drawings showing the locations, size, color, shape, and type of illumination of each proposed sign.

G. Other information as determined by the city planner. [Ord. 07-1284 § 3 (Exh. C), 2007; Ord. 979 § 2 (Exh. A), 1990.]

Response to F & G: The applicant respectfully requests that any additional items or information required by the planning commission or city planner be communicated through a Notice of Incomplete (NOI) in accordance with the FCC 90-day shot clock as outlined in the Spectrum Act. This will ensure timely and efficient processing of the application.

Notice of Actions Affecting This Design Review Permit

In accordance with California Government Code Section 65945(a), The applicant requests notice of any proposal to adopt or amend the: general plan, specific plan, zoning ordinance, ordinance(s) affecting building or grading permits that would in any manner affect this development permit. Any such notice may be sent to 2009 V Street, Sacramento, CA 95818. Attn: Steve Proo.

Thank you,

Steve Proo
Planning Specialist – Land Use Development
Complete Wireless Consulting
sproo@completewireless.net
Cell – 916-838-6713

BEFORE THE PLANNING COMMISSION OF THE CITY OF PITTSBURG

In the Matter of:

Resolution Amending the Categories of Eligible)
Projects and Revising the Procedures for) Resolution No. 9918
Delegating Design Review Authority of Certain)
Types of Projects to the Zoning Administrator)

The Planning Commission DOES RESOLVE as follows:

Section 1. Background

A. On August 26, 2003, the Planning Commission adopted Resolution No. 9444 in an effort to streamline the planning review process for certain projects that the Commission had determined to be routine in nature and have minimal visual impacts on the surrounding community. This resolution authorized various types of projects to be reviewed by the Zoning Administrator rather than the Planning Commission, including "Wireless Communication Antennas, Monopoles and Related Structures and Equipment."

B. On August 14, 2012, in response to recent Commission concerns regarding the approval process for wireless telecommunication equipment, a study session was conducted with the Planning Commission to review proposed updates to the existing design review delegation procedures. At this study session, the consensus of a majority of Commissioners was to keep all staff proposed changes, with an added clarification on the recommended voting process (Section B) for calling up items to be reviewed by the Commission.

C. Proposed changes to the existing staff delegated design review authority (as presented during the August 14, 2012, study session) generally include: 1) a modification to the text of category 2, "Wireless Communication Antennas, Monopoles and Related Structures and Equipment," intended to separate out construction of new wireless telecommunications facilities from requests for modifications to existing facilities, with the only latter retaining eligibility for delegated review by the Zoning Administrator; 2) a revision to Category 3 to clarify that it applies to all minor building remodels and not just 'storefront' remodels; 3) a consolidation of Category 7 (changes in building colors) into Category 3; 4) a clarification to Category 9 to confirm application within all districts, not just Industrial areas; and 5) a clarification within Section B clarifying that a Commissioner's request to rescind delegated authority for a specific application, otherwise eligible for Zoning Administrator review, must be supported by a majority of the Commissioners present.

D. Pittsburg Municipal Code (PMC) Section 18.10.020, *Powers and Duties of the Planning Commission,* grants primary design review authority to the Planning

Commission. In 2003 the Planning Commission delegated its review and approval authority of certain routine and non-controversial application types to the Zoning Administrator through the adoption of Resolution No. 9444. Changes or revisions to Resolution No. 9444 fall within the same category as the original delegation, which the Commission has authority to approve under PMC 18.10.020.

E. PMC Section 18.10.030 identifies the City Planner as the Zoning Administrator, and in accordance with PMC Section 18.10.100, the City Planner will continue to give notice to the Planning Commission of intent to exercise any authority that the Commission previously granted, including the authority to review and approve staff delegated design review applications.

F. Staff would continue to be responsible for reviewing delegated applications for compliance with the General Plan, City Codes and adopted Design Guidelines, and the Zoning Administrator would continue to be required to make findings for approval and identify evidence to support the required findings, consistent with PMC Section 18.36.220(B). Approved resolutions would continue to be signed by the Zoning Administrator and no separate staff reports would be prepared on these items.

G. Copies of all Zoning Administrator approved resolutions would continue to be forwarded to the Commission in its packet for the next regularly scheduled meeting.

H. The proposed action delegating certain Planning Commission discretionary authority to the Zoning Administrator is not considered a project, as defined by the Public Resources Code section 21065, of the California Environmental Quality Act (CEQA).

I. On September 25, 2012, the Planning Commission considered the proposed revisions to the staff delegated design review authority process as previously established by adoption of Resolution No. 9444.

Section 2. Decision

A. The Planning Commission hereby delegates discretionary Design Review Authority to the Zoning Administrator, for the following types of applications, when categorically or statutorily exempt from the provisions of CEQA:

1. Freestanding Signs. Applicable to signs not already part of a sign program; must be consistent with sign standards and architecturally compatible with associated building.

2. Wireless Communication Equipment. New or replacement antennas on existing poles and their related equipment.

3. Minor Building Remodels. Limited to changes in building colors, awnings, fenestration, and finishes.

4. Changes to Existing Parking Lots.

5. Changes to Existing Landscaping.

6. Additions to Existing Buildings. Additions must be smaller than 2,500 sq. ft. and designed to complement existing building architecture.

7. New Model Homes in Approved Subdivisions. Must be consistent with the general size, quality of architecture and materials, and general character of the originally approved models. Must comply with approved zoning development standards.

8. Ancillary Structures. Structures in any district where visual impacts are minimal, including miscellaneous mechanical equipment associated with legal uses in Industrial Districts.

B. In compliance with PMC Section 18.10.100, staff shall prepare a list and brief description along with a copy of the project plans when applicable, of new pending applications for which the Zoning Administrator intends to exercise delegated design review authority, and submit it to the Commission at a Commission meeting prior to taking any action on the applications. Any member of the Planning Commission may then request at that time to have the matter scheduled for future consideration by the entire Commission. The Commission must approve the request as a group through a majority vote, prior to scheduling the item for future consideration.

C. Staff shall continue to prepare resolutions of approval, when appropriate, describing the project, project location, applications being filed, required findings to approve the project and identifying evidence to support the required findings. Resolutions shall be signed by the Zoning Administrator and continue to have conditions of project approval, where applicable.

D. To keep the Commission informed about what applications are processed under this proposal, copies of all Zoning Administrator approved resolutions shall be forwarded to the Commission in its packet for the next regularly scheduled meeting.

E. If the Zoning Administrator does not believe he/she can make the required design review findings to approve a project, and the applicant is unwilling or unable to make the changes requested, the application shall automatically be referred to the Commission for action on the design review application.

Section 3. Effective Date

This resolution shall take effect immediately upon its adoption.

On motion by Commissioner Wirick, seconded by Commissioner Gargalikis, the foregoing resolution was passed and adopted the 25th day of September, 2012, by the Planning Commission of the City of Pittsburg, California by the following vote:

AYES: Fardella, Fogleman, Gargalikis, Kelley, Ohlson, Wirick

NAYES:

ABSTAIN:

ABSENT: Diokno

I hereby certify that the above Resolution No. 9918 was adopted by the Planning Commission of the City of Pittsburg on September 25, 2012.

KRISTIN VAHL POLLOT, SECRETARY
PITTSBURG PLANNING COMMISSION