



**NATIONAL BEEF BRAWLEY  
WASTEWATER PRE-TREATMENT FACILITY  
CLOSURE PROJECT**  
Initial Study/Negative Declaration

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## 1.1. INTRODUCTION

National Beef California, LP (National Beef) is proposing a Wastewater Pre-Treatment Facility (WWPT) Closure Project (Project or WWPT Closure Project) at its beef processing facility, which is located at 57 East Shank Road in Brawley, Imperial County, California.

On June 5, 2014, National Beef submitted to the California Regional Water Quality Control Board, Colorado River Basin Region (Colorado River Basin Water Board or the Regional Board) its work plans for closing the on-site WWPT in compliance with Cleanup and Abatement Order R7-2014-0033 (CAO R7-2014-0033). The Project will take approximately four years to complete and would include clean closure of the WWPT system (see Attachment A for WWPT Facility Closure Work Plan and Attachment B for WWPT Final Effluent Work Plan).

## 1.2. AGENCY AUTHORITY

The California Environmental Quality Act (CEQA) (Public Resources Code § 21000 et seq.), and the CEQA Guidelines, CEQA's implementing regulations (Title 14 California Code of Regulations §15000 et seq.), require that the environmental impacts of a public agency's proposed discretionary action be evaluated and that feasible methods to reduce, avoid or eliminate significant adverse impacts of such actions be identified and implemented, if feasible. The Lead Agency is the public agency that has the principal responsibility for carrying out or approving a "project" that may have a significant effect upon the environment (Public Resources Code Section 21067). The proposed WWPT Closure Project requires discretionary approval from the Regional Board for the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan; therefore, it is a "project" subject to the requirements of CEQA. Because the Regional Board has the primary responsibility for supervising or approving the major permits for the WWPT Closure Project, it is the most appropriate public agency to act as Lead Agency (CEQA Guidelines Section 15051(b)).

CAO R7-2014-0033 required National Beef to procure the services of a professional experienced in the preparation of CEQA documents (e.g., Initial Studies, Negative Declarations, and Environmental Impact Reports) and procedures to assist the Colorado River Basin Water Board in completing its obligations under CEQA for the closure of National Beef's wastewater facilities. National Beef complied with this requirement by retaining Trinity Consultants. The Regional Board requested the consultant to prepare an Initial Study on behalf of the Regional Board to assess whether or not there would be potential adverse environmental impacts associated with implementation of the Project.

In accordance with Section 15002(a) of the CEQA Guidelines, the basic purpose of CEQA is to inform responsible agencies and the general public of the potential significant environmental effects of a project, identify possible ways to minimize the significant effects through the use of mitigation measures or alternatives to the project, and disclose to the public the reasons why a government agency approved the project if significant environmental effects are involved.

The evaluation presented in Chapter 2 presents the analysis and discussions for the following areas: aesthetics, agricultural and forestry resources, air quality and greenhouse gas, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, utilities/service systems and mandatory findings of significance.

This Initial Study/Negative Declaration focuses on whether the proposed Project may cause significant effects on the environment. The Initial Study/Negative Declaration is also intended to assess whether any environmental effects of the Project are susceptible to substantial reduction or avoidance by the choice of

specific revisions in the Project, by the imposition of conditions, or by other means [CEQA Guidelines §15152(b)(2)]. If such revisions, conditions or other means are identified, they will be identified as mitigation measures. The determination of whether a project may have a significant effect on the environment is a critical step in the CEQA process, and one that requires professional knowledge and judgment, as described in CEQA Guidelines Section 15064. The determination should be based on substantial evidence in the record and, to the extent feasible, on scientific and factual data. (<http://ceres.ca.gov/topic/env Law/ceqa/guidelines/>)

### 1.3. PROJECT LOCATION

The proposed Project is located at the existing National Beef facility in Brawley, Imperial County, California. Brawley is in southern California roughly 125 miles east of downtown San Diego, 200 miles southwest of downtown Los Angeles and 240 miles west of downtown Phoenix. The National Beef Brawley facility is situated along the northern edge of Brawley at 57 East Shank Road. The Project site is south of the new State Route 78/111 Brawley Bypass, north of the Brawley Municipal Airport, east of Southern Pacific Railroad, and west of agricultural fields. The proposed Project is entirely within the property boundaries of the existing National Beef Brawley facility. It is located on Imperial County Assessor's Parcel Number 047-010-029, an 87-acre parcel, within Track 76, Township 13 South, Range 14 East, San Bernardino Baseline and Meridian.

The Project area is within an "Industrial" land use classification within the General Plan (City of Brawley 2008). The Project is within an "M-2 Heavy Manufacturing" zone (City of Brawley 2013). The Project area is surrounded by industrial and agricultural uses: to the west are a railroad and industrial uses; to the north are the Brawley By-Pass and agricultural fields; to the east is an agricultural field; and to the south are the Brawley Municipal Airport runway and a residential neighborhood.

Figures 1-1 and 1-2 depict the regional and Project location. Figures 1-3 and 1-4 depict the Project site plan and an aerial view of the existing National Beef Brawley facility.

Figure 1-1. Regional Location

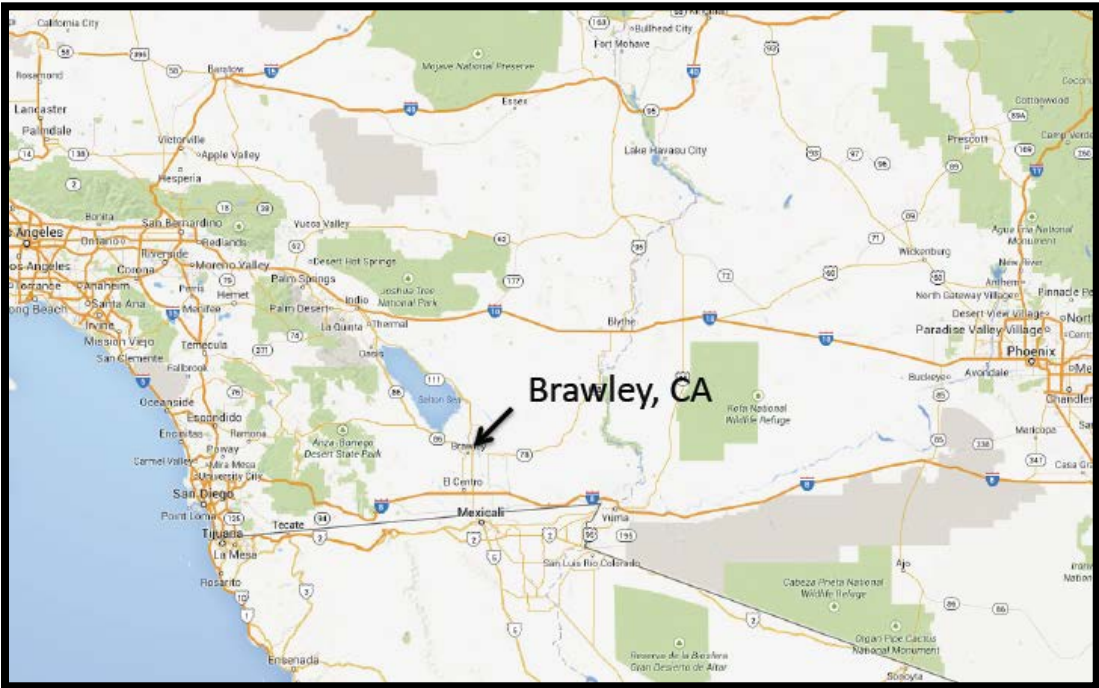


Figure 1-2. Project Site Location



Figure 1-3. Project Site Plan

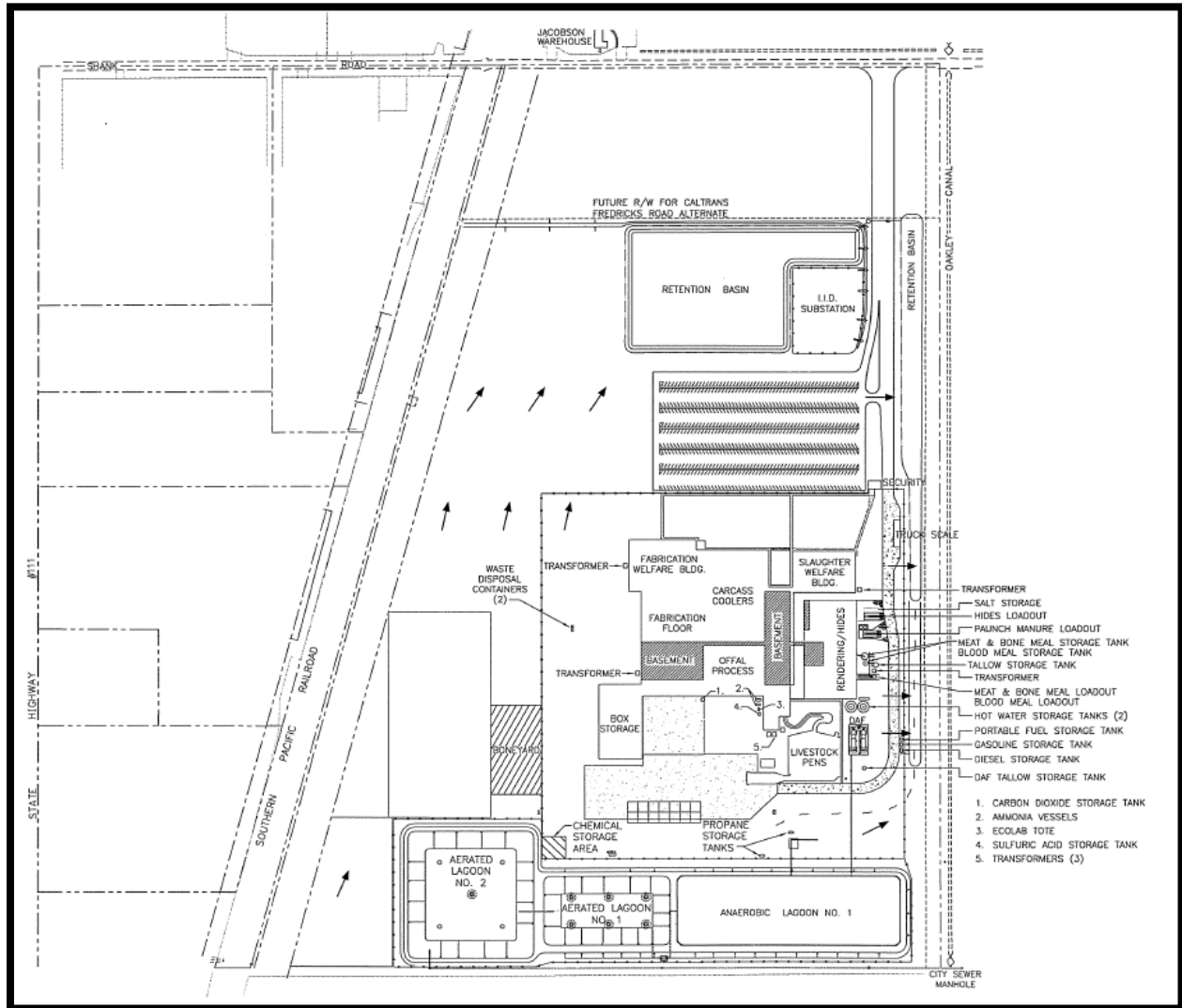
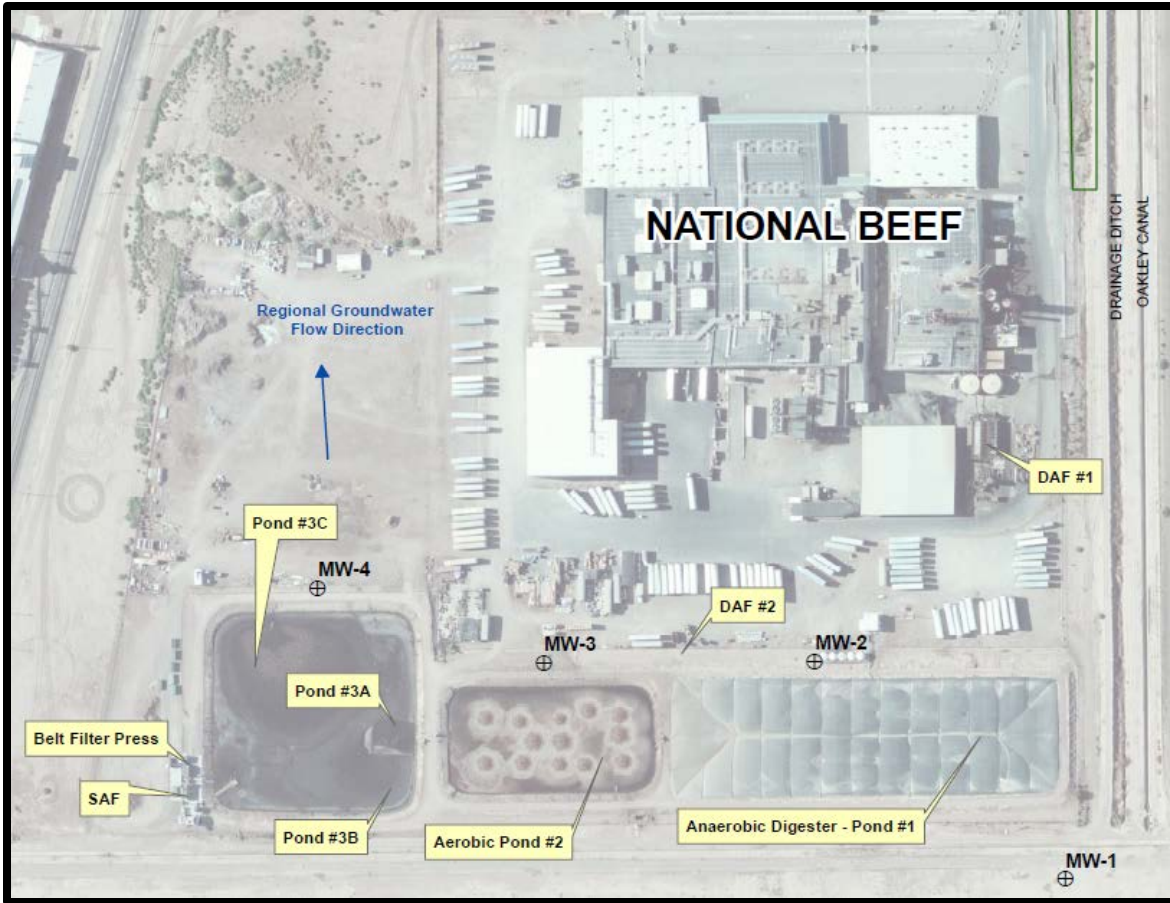




Figure 1-4. Project Site Aerial



Notes: DAF = dissolved air flotation units; SAF = suspended air flotation system; MW = monitoring well

## 1.4. EXISTING CONDITIONS

The beef processing facility was built in 2001 by Brawley Beef, LLC, which was acquired by National Beef in 2006 as an existing beef processing facility.

The National Beef Brawley facility is a 345,769 square foot gated facility. Up until May 2014, it offered boxed beef and variety meats and beef byproducts domestically and internationally. National Beef processed from 1,600 to 2,500 cattle per day through holding pens, a slaughterhouse and then fabrication operations for the market.

National Beef processed or recycled all constituents of the livestock. In addition to boxed beef, the National Beef Brawley facility rendered fat and bone as well as cleaned and cured hide for market byproducts. The National Beef Brawley facility separated food products and byproducts from compostable waste and wastewater. A detailed cleaning and sanitization process was completed daily.

In May 2014, National Beef ceased all beef processing at its Brawley facility. The WWTP system has and will continue to operate at decreasing levels during the approximately four-year Closure Project until it is complete.

### 1.4.1. WWPT System Overview

A complex on-site WWPT system collected, neutralized and processed wastewater before discharging it into the City of Brawley municipal sewage collection system and areal groundwater through unlined ponds. The WWPT consists of: (1) screening; (2) two parallel dissolved air floatation cells (DAFs) (DAF 1 on Figure 1-4); (3) an anaerobic digester (Pond 1 on Figure 1-4); (4) an intermediate DAF (DAF 2 on Figure 1-4); (5) an aerobic activated sludge pond (Pond 2 on Figure 1-4); (6) two clarifier/polishing ponds (Ponds 3A and 3B on Figure 1-4); (7) a suspended air floatation system (SAF) unit; and (8) a reserve pond used for slug diversion (Pond 3C on Figure 1-4) and a belt filter press used to dewater sludge. There are also two unlined on-site stormwater ponds at the north and east edge of the site (see Figure 1-3) that are not part of the WWPT system.

Facility process wastewater was generated from the slaughterhouse, refrigeration, rendering and fabrications operations, and boilers; facility process wastewater was directed through a screen, routed to a wet well and then entered the WWPT starting with the two DAFs (DAF 1 on Figure 1-4) to remove grease and solids prior to anaerobic treatment.

Cooling water, cattle pen misters, pen washings and DAF stick water went directly into the anaerobic lagoon (Pond 1 on Figure 1-4) at an estimated maximum rate of up to 95,000 gallons per day (GPD).

Sanitary wastewater discharge generated from employees and contractors was sent directly to the City of Brawley municipal sewer system and Publicly Owned Treatment Works (POTW) until May 2013 when the City of Brawley required National Beef to divert the sanitary flow to the anaerobic digester. An application is in process to reconnect sanitary flow to the City of Brawley sewer in late 2014.

Prior to May 2014, facility process wastewater flow going to the WWPT ranged from 700 to 2000 gallons per minute (GPM) with an average flow of 1.7 million gallons per day (MGD). The WWPT discharged to the POTW at a maximum rate of 1,200 GPM (1.728 MGD). The last discharge from the National Beef WWPT to the City of Brawley POTW was July 31, 2014.

### 1.4.2. DAF Treatment

The facility operated two pre-anaerobic DAF units that received flow from a wet well. Float switches control operation of the duplex wet well pumps. Discharge of the wet well pumps is routed through a magnetic flow meter and then a splitter box. The splitter box has two bottom outlets to distribute flow among the two DAF units. The DAF units were installed at different elevations so that series or parallel operations are possible. No wastewater treatment chemicals were added before the flow reached the DAF units.

Float from each DAF unit flowed into a series of melt tanks, screens and centrifuges to separate fats to produce tallow. A bottom skimming chain continuously pulled heavy solids and grits from each DAF. Captured solids were transferred by an auger to a grit trailer and transported offsite for disposal. From the end of July 2014 forward, only water, sanitary flow and cleaning fluids are being discharged into the WWPT.

### 1.4.3. Pond 1 Anaerobic Lagoon

Pond 1 is a covered anaerobic lagoon (without oxygen) operated to convert as much of the biochemical oxygen demand (BOD) as possible (averaging 65 percent) from the DAF effluent into biogas. This biogas was either used to fuel a dedicated on-site boiler or combusted in an on-site flare. This pond is approximately 10 years old and the original design documents indicate that it is clay lined. It has a design operating volume of 9.5 million gallons (MG). It is approximately 15 feet deep with a bottom elevation of 856 feet and design water surface of 871 feet. The pond was gravity fed effluent from DAF 1 through a manhole. A section pipe and pump (installed in 2012) routed effluent from Pond 1 into DAF 2 for treatment before entering Pond 2. The outlet pump was operated at a constant speed of approximately 1,200 GPM. Pond 1 served as a storage and equalization station (four to seven day detention capacity) to allow variations in influent flow due to various production levels during the

week; during the weekends, the WWPT system would bleed down Pond 1 when there were no facility operations.

#### **1.4.4. DAF 2 (Pond 1 Effluent DAF)**

DAF 2 was installed in 2012 to prevent grease from entering pond 2. Rated at 3,000 GPM, effluent from Pond 1 flowed at an average transfer rate of 1,200 GPM through DAF 2. Float from this DAF was sent to a belt filter press.

#### **1.4.5. Pond 2 Aerobic Lagoon**

Pond 2 is an aerobic lagoon (with oxygen) operated to remove BOD and ammonia. This pond is approximately 10 years old and the original design documents indicate that it is clay lined. It has a design operating volume of 2.9 MG and a hydraulic retention time of 1.7 days at 1.7 MGD. Pond 2 is gravity fed from DAF 2. Aeration is supplied by 13 surface aerators (eight at 40 horsepower each and five at 75 horsepower each) and four Oxiworks floating laterals (ten fine bubble diffusers per lateral).

#### **1.4.6. Pond 3A, Pond 3B (clarifier), Pond 3C and SAF**

Pond 3 has a capacity of 6.2 MG and has been retrofitted into three separate ponds (3A, 3B and 3C). Effluent from Pond 2 is gravity fed to Pond 3A, the main clarifier for the secondary treatment system. Effluent flows from Pond 3A into Pond 3B through a weir. Pond 3B is pumped into the SAF, a tertiary solids removal system; effluent then flows into the City POTW. Pond 3A is 60 by 70 feet. Pond 3B is 60 by 90 feet. Pond 3C is currently not part of the treatment system; it was taken out of service for sludge dredging activities in 2012.

### **1.5. PROPOSED WWPT CLOSURE PROJECT**

National Beef initiated its WWPT Closure Project on June 5, 2014, when it submitted its WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan to the Colorado River Basin Water Board in compliance with CAO R7-2014-0033. The WWPT Closure Project would take approximately four years to reach clean closure of the WWPT system. The Project would include no new construction, process equipment, or control equipment. The proposed Project includes implementing the WWPT Facility Closure and Effluent Work Plans as summarized in Table 1-1.

**Table 1-1. WWPT Facility and Effluent Closure Work Plans**

Closure Steps	Summary of Closure Plan by Phase
1. Pond & Equipment Decommissioning Phase 1	Decommission Pond 3C – duration 5 months (began February 2014) Decant and pump residual wastewater into Pond 2. Follow Sludge Drying and Landfill Plan for residual sludge disposal (3 months). Follow Pond Liner Excavation and Disposal Plan for liner removal (2 months).
2. Pond & Equipment Decommissioning Phase 2	Decommission equipment upstream of Pond 1 – duration 2 months Flows to remain in the order of 1.5 to 1.7 MGD Continue downstream treatment to meet permit limits for discharge to City POTW. Assess residual sludge in Pond 2. Decommission DAF 1 (1 month).
3. Pond & Equipment Decommissioning Phase 3	Decommission Pond 2 – duration 12 months Stop pumping flow from Pond 1 and DAF 2 into Pond 2. Stop pumping Pond 3A return activated sludge to Pond 2. Turn off and remove aeration equipment. Use hydraulic dredger to remove sludge from pond bottom and pump to belt filter press (3 months). Discharge Pond 2 water through SAF to City POTW under existing permit. Follow Sludge Drying and Landfill Plan for residual sludge disposal (6 months). Follow Pond Liner Excavation and Disposal Plan for liner removal (2 months).
4. Pond & Equipment Decommissioning Phase 4	Decommission equipment downstream of Pond 2 – duration 4 months Pump down wastewater in Ponds 3A and 3B into SAF. Pump sludge to belt filter press. Follow Sludge Drying and Landfill Plan for residual sludge disposal (3 months). Follow Pond Liner Excavation and Disposal Plan for liner removal (1 month).
5. Pond & Equipment Decommissioning Phase 5	Pond 1 Wastewater Treatment and Decommissioning – duration 36 months <i>5A - Recirculation for maximum biodegradation – duration 12 – 18 months</i> Isolate Pond 1 by closing valves and plugging pipes. Continually recirculate wastewater to enhance anaerobic digestion & biodegradation. <i>5B - Demolish gas collection system and remove sludge and FOG – duration 8 months</i> Raise pH of Pond 1 to pH of 8 to minimize release of odors. Expel and combust as much gas as possible prior to opening cover. Shut down flare after gas flow has diminished. Remove gas piping system. Continue odor destruction activities using Chemtreat odorant.

	<p>Remove FOG from Pond 1.  Use hydraulic dredger to remove sludge from pond bottom and pump to belt filter press (6 months).  <i>5C - Aerobic Wastewater Treatment – duration 12 months</i>  Continue odor destruction and masking activities using Chemtreat odorant.  Add aeration and mixing equipment.  Remove organic matter in compliance with APCD Rule 407. Mix and aerate wastewater (4 months).  Allow suspended solids to settle.  Decant wastewater in Pond 1, treat with DAF 2 and SAF prior to discharge to City POTW and in compliance with permit limits.  Follow Sludge Drying and Landfill Plan for residual sludge disposal (6 months).  Follow Pond Liner Excavation and Disposal Plan for liner removal (2 months).</p>
6. Pond & Equipment Decommissioning Phase 6	<p>Final Cleaning and Removal of DAF 2 and SAF – duration 3 months (after conclusion of Phase 5C)  Comply with APCD Rules 801, 803, and 805 to minimize particulate matter emissions.  Apply water spraying to minimize dust during earth moving activities.  Repeat testing, excavation and landfilling as required.</p>
7. Sludge Drying & Landfill Plan	<p>Applies to Ponds 1, 2, 3A, 3B and 3C (as referenced above) upon completion of dewatering of each.  Solar dry residual sludge, turn over mechanically, continue solar drying, test solids as required by landfill and dispose in compliance with rules and regulations.  Comply with APCD Rules 801, 803, and 805 to minimize particulate matter emissions.  Apply water spraying to minimize dust during earth moving activities.  Repeat drying and excavation until all sludge is removed.</p>
8. Wastewater Pond Liner Excavation & Disposal	<p>Perform pond bottom soils testing.  Excavate and landfill three inches of soil.  Comply with APCD Rules 801, 803, and 805 to minimize particulate matter emissions.  Apply water spraying to minimize dust during earth moving activities.  Repeat soils testing and excavation as required for completed removal of contaminated liner.</p>
9. Wastewater Ponds Nuisance Prevention	<p>After completion of Closure Steps 1 through 8, above, conduct a geotechnical investigation to determine the infiltration rate of each pond bottom. If the investigation concludes that the ponds will not naturally drain sufficiently to prevent nuisance conditions, design solutions will be proposed and evaluated to prevent nuisance.</p>
10. Groundwater Monitoring Plan	<p>Referencing HR Green Groundwater Study (September 26, 2013), Collect, Analyze and Annually Repeat Groundwater Samples at Monitoring Wells, Provide a Comprehensive Chemical Inventory, and Plug &amp; Abandon Wells in accordance with appropriate regulations.</p>
11. Closure of 2 Stormwater Ponds	<p>Retain two existing stormwater retention basins that are not part of the WWPT (see Figure 1-3) to protect downstream properties and roads. Test soils 3 inches below grade of pond bottoms. Only if required by soils</p>

	testing, landfill top three inches of soil.
12. Final Clean Closure Documentation	Complete Pond Decommissioning Report, Submit Notice of Termination of the General Industrial Stormwater Permit (if applicable),
13. Continuing Activities	Continue Groundwater monitoring as described in Groundwater Monitoring Plan. Continue monitoring former wastewater pond area to prevent nuisance conditions.

Source: HR Green 2014a.

Note: There may be some overlap between closure steps; see WWPT Facility Closure Work Plan (HR Green 2014a).

Table 1-2 presents a summary of National Beef Brawley facility operations, comparing existing June 2014 conditions with the proposed WWPT Closure Project. Although all livestock slaughter operations have ceased, there would be fuel consumption and transportation activity for the duration of the four-year WWPT closure and decommissioning activities. Process wastewater was discharged through the entire WWPT and then discharged into the Brawley POTW through July 31, 2014. An application is in process to reconnect sanitary flow to the City of Brawley sewer in late 2014. Although National Beef is decommissioning its WWPT, the buildings will remain in place and available for other potential operations in the future. The proposed Project encompasses WWPT decommissioning as described in Table 1-1. As shown in Table 1-2, the proposed Project would eventually minimize utility consumption, traffic generation and effluent flows at the National Beef Brawley facility once the WWPT Closure Project is complete. Up to 10 total truck trips per day from two categories of trucks would be operating during the WWPT Closure Project: up to 5 dump trucks per day hauling sludge to the landfill and up to 5 on-site trucks per day decommissioning the WWPT.

Effluent flow declined from 1.7 MGD to less than 0.6 MGD during initial facility cleaning (one month) that has already occurred, will decline to less than 0.5 MGD during WWPT decommissioning for the following 42 months, and would eventually decline to minimal discharge after completion of the WWPT Closure Project.

**Table 1-2. Summary of National Beef Brawley Facility Operations**

	Existing Conditions (June 2014)	Proposed WWPT Closure Project (decommissioning complete)
Electricity Consumption (monthly average KWh)	800,000	50,000 (minimal)
Natural Gas (monthly average MMBtu)	12,500	0
Trucks (daily average)	5-10 trucks	0
Water Usage (daily average gallons)	56,500	300 (domestic only)
Effluent Flow (daily average gallons)	83,000	300 (domestic only)

Source: National Beef California, LP. 2014

## 1.6. RELATED PERMITS AND REGULATIONS

The proposed Project may or may not affect existing permits from a variety of agencies (potentially federal, state, regional and local). Table 1-3 summarizes major relevant existing permits and regulations for the National Beef Brawley facility (not necessarily exhaustive). A number of the permits could be affected by the WWPT Closure Project.

**Table 1-3. Summary of Major Relevant Permits and Regulations**

Agency, Permit	Requirement/Regulation	Applicability to Project
<b>Federal</b>		
<p><b>U.S. Environmental Protection Agency (EPA)</b></p> <p><b>Title V Permit - operations</b></p> <p><b>Prevention of Significant Deterioration - construction</b></p> <p><b>Risk Management Plan, Hazardous Materials Business Plan, and Spill Prevention Control &amp; Countermeasure Plan</b></p>	<p>Clean Air Act – New Source Review Program</p>	<p>May need to modify the existing permit to operate, or modify air emission sources for sources emitting above regulated thresholds.</p> <p>Construction of new permitted sources (which are not anticipated) could trigger Prevention of Significant Deterioration air quality requirements for new and modified major stationary sources in nonattainment areas.</p>
	<p>Section 112 (r) of the Chemical Accident Prevention Provisions of the 1990 Clean Air Act</p>	<p>May need to revise Risk Management Plan, Hazardous Materials Business Plan, and Spill Prevention Control &amp; Countermeasure Plan</p>
<b>State</b>		
<p><b>California Department of Toxic Substances Control (DTSC)</b></p> <p><b>Hazardous Materials Business Plan; and Prepare Spill Prevention Control &amp; Countermeasure Plan</b></p>	<p>Resource Conservation &amp; Recovery Act of 1976; and California Health &amp; Safety Code</p>	<p>May need to revise Hazardous Materials Business Plan; and Prepare Spill Prevention Control &amp; Countermeasure Plan</p>
<b>Regional</b>		
<p><b>Colorado River Basin Water Board</b></p> <p><b>CAO R7-2014-0033</b></p>	<p>Clean Water Act and Porter-Cologne Water Quality Control Act</p>	<p>Cleanup and Abatement Order</p>
	<p>CEQA</p>	<p>Lead agency for preparation and certification of the proposed Project Initial Study/Negative Declaration.</p>

<b>Imperial County Air Pollution Control District (ICAPCD)</b>  <b>Permit to Operate</b>	Rule 208: Permit to Operate	May require modification of permit to operate stationary source emissions including 600 horse power (hp) boilers, Hurst boiler, VAREC Anaerobic Pond Flare, Scrubber Systems, and Ludell DCWH 2500 Water Heaters.
	Rule 212: Annual Renewal	Requires permits to be renewed annually.
	Rule 801, 803, 805: Dust Control	Regulates all areas where dust may be suspended.
	Rule 407: Nuisances	Regulates Pond 2 operations as well as all sources of moving and processing the waste stream.
<b>Local</b>		
<b>City of Brawley Public Works</b>  <b>Industrial User Pretreatment Permit</b>	City of Brawley ordinance	May require modifications of Industrial User Pretreatment Permit, as required for all discharges of wastewater in municipal sewer for processing by the Brawley POTW
<b>Imperial County Environmental Health Department</b>  <b>Spill Prevention Control &amp; Countermeasure Plan; Prepare Hazardous Materials Business Plan</b>	Resource Conservation & Recovery Act of 1976; and California Health & Safety Code	May require modifications of Spill Prevention Control & Countermeasure Plan; Prepare Hazardous Materials Business Plan

### 1.7. PRELIMINARY REVIEW

This preliminary review indicates that:

- The proposed action constitutes a project.
- The project is not a Ministerial Project.
- The project is not an Emergency Project.
- The project does not constitute a feasibility or planning study.
- The project is not statutorily exempt under CEQA.
- The project is not categorically exempt.
- The project does not involve another public agency that is the lead agency.

### 1.8. PRELIMINARY FINDINGS

The Colorado River Basin Water Board, having undertaken and completed a preliminary review of the National Beef WWPT Closure Project, has determined that:



- The project is discretionary and is not otherwise exempt.
- The Colorado River Basin Water Board is the Lead Agency under CEQA with primary responsibility for approval of the project.
- The ICAPCD is a Responsible Agency as it has facility permits which may be affected.
- The DTSC is a Responsible Agency as it has facility permits which may be affected.
- The City of Brawley Public Works Department is a Responsible Agency as it has facility permits which may be affected.

This Initial Study/Negative Declaration is being undertaken for the purpose of ascertaining whether the proposed Project could have a significant effect on the environment.

## 2. ENVIRONMENTAL CHECKLIST

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The environmental checklist is presented and discussed hereafter in the following order.

- 2.1. Introduction
- 2.2. General Information
- 2.3. Environmental Factors Potentially Affected
- 2.4. Determination
- 2.5. Environmental Checklist and Discussion
  - 1.0 Aesthetics
  - 2.0 Agriculture Resources
  - 3.0 Air Quality
  - 4.0 Biological Resources
  - 5.0 Cultural Resources
  - 6.0 Geology and Soils
  - 7.0 Hazards and Hazardous Materials
  - 8.0 Hydrology and Water Quality
  - 9.0 Land Use and Planning
  - 10.0 Mineral Resources
  - 11.0 Noise
  - 12.0 Population and Housing
  - 13.0 Public Services
  - 14.0 Recreation
  - 15.0 Solid/Hazardous Waste
  - 16.0 Transportation/Traffic
  - 17.0 Mandatory Findings of Significance

Report Preparation

References

Acronyms

Attachment A - WWPT Facility Closure Work Plan

Attachment B - WWPT Final Effluent Work Plan

## 2.1. INTRODUCTION

The environmental checklist provides a standard evaluation tool to identify a proposed project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the proposed project.

## 2.2. GENERAL INFORMATION

<b>Project Title:</b>	Wastewater Pre-Treatment Facility Closure Project
<b>Lead Agency Name:</b>	Colorado River Basin Regional Water Quality Control Board
<b>Lead Agency Address:</b>	73-720 Fred Waring Drive, Suite 100, Palm Desert CA 92260
<b>Contact Person:</b>	Jose Angel, P.E. Assistant Executive Officer
<b>Contact Phone Number, email:</b>	(760) 776-8932, Jose.Angel@waterboards.ca.gov
<b>Project Sponsor's Name:</b>	National Beef Company, Bud Ludwig, Corporate Environmental Director
<b>Project Sponsor's Address:</b>	P.O. Box 20046, Kansas City, MO 64195-0046
<b>General Plan Designation:</b>	Industrial
<b>Zoning:</b>	M-2 Heavy Manufacturing
<b>Description of Project:</b>	Proposed WWPT Closure Project involves implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, process equipment, or control equipment.
<b>Surrounding Land Uses and Setting:</b>	The Project area is surrounded by industrial and agricultural uses: to the west is a railroad and industrial uses; to the north is the Brawley By-Pass and agricultural fields; to the east is an agricultural field; and to the south is the Brawley Municipal Airport runway and residential neighborhood.
<b>Other Responsible Agencies:</b>	ICAPCD, DTSC, and City of Brawley Public Works Department

## 2.3. EVALUATION OF ENVIRONMENTAL IMPACTS

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages. Because the evaluation found no “potentially significant” impacts requiring mitigation, none of the following issues areas below have been checked.

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Aesthetics            | <input type="checkbox"/> Agriculture Resources         | <input type="checkbox"/> Air Quality & Greenhouse Gas       |
| <input type="checkbox"/> Biological Resources  | <input type="checkbox"/> Cultural Resources            | <input type="checkbox"/> Hydrology / Water Quality          |
| <input type="checkbox"/> Geology / Soils       | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Noise                              |
| <input type="checkbox"/> Land Use / Planning   | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Population / Housing  | <input type="checkbox"/> Public Services               | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Solid/Hazardous Waste | <input type="checkbox"/> Transportation/Traffic        |   |

- 1) A brief explanation is required for all answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from a “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following: a) Earlier Analysis Used. Identify and state where they are available for review. b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis. c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,”

describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify: a) the significance criteria or threshold, if any, used to evaluate each question; and b) the mitigation measure identified, if any, to reduce the impact to less than significant.

## 2.4. DETERMINATION

On the basis of this initial evaluation:

- I find the proposed project COULD NOT have a significant effect on the environment, and that 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 significant effects 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(s) on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant 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, nothing further is required.

Signature: *Jose Angel* Date: September 24, 2014  
*for* Jose Angel, P.E.  
Assistant Executive Officer

## 2.5. ENVIRONMENTAL CHECKLIST AND DISCUSSION

<b>1.0 AESTHETICS</b> <i>Would the project:</i>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

The proposed project impacts on aesthetics will be considered significant if:

- The project will block views from a scenic highway or corridor.
- The project will adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

### Environmental Settings and Impacts

The topography of the surrounding area includes the Brawley By-Pass and agricultural uses to the north and east, a municipal airport and residential neighborhoods to the south, and a railroad and industrial uses to the west. Brawley is located within the Imperial Valley, which is an area characterized by poor visual quality due to existing dust conditions. The immediate area lacks visual quality due to the surrounding industrial activities and the Brawley By-Pass. The Project is not part of any scenic view shed.

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, process equipment, or control equipment.

**1. a), b), and c):** The Project site is an industrialized setting along the Brawley By-Pass; it is not designated as a Scenic Highway, a scenic vista or resource. The Project would not include additions to current structures or surrounding areas. Because the Project is neither in an area characterized as a scenic vista or scenic resource, the Project would not affect the visual character of the site. This proposed Project would have no scenic or visual impact. No mitigation measures would be required.

**2. d):** The Project does not include additions to current structures or surrounding area which includes installations of exterior lighting or other light or glare sources. Because the Project would not include any new exterior lighting or other light or glare sources, the Project would not be considered a significant source of lighting or glare in the project area. The proposed Project would have no light or glare impact. No mitigation measures would be required.

## **Mitigation Measures**

No significant adverse impacts from the proposed Project on aesthetics would be expected; therefore, no mitigation measures are required.

2.0 AGRICULTURE AND FOREST RESOURCES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

Project-related impacts on agricultural resources will be considered significant if any of the following conditions are met:

- The proposed project conflicts with existing zoning or agricultural use or Williamson Act contracts.
- The proposed project will convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use.
- The proposed project would involve changes in the existing environment, which due to their location or nature, could result in conversion of farmland to non-agricultural uses.

### Environmental Setting and Impacts

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, process equipment, or control equipment.

**2. a), b), c), d) and e):** The proposed Project would occur within the confines of the existing facility. The project would be consistent with the industrial land use designation and the M-2 Heavy Manufacturing zoning for the facility. No agricultural or forest resources are present at the facility. Agricultural activities are in the immediate vicinity to the north and east; the proposed Project would have no effect on these agricultural activities. Therefore, the proposed Project would not convert farmland to non-agricultural use or involve other changes in the existing environment that could convert farmland to non-agricultural use or conflict with agricultural land uses, or Williamson Act contracts. Additionally, the proposed Project would not result in the



loss of forestland or conversion of forestland to non-forest use. Finally, there is no conflict with existing zoning for agricultural or forest use nor would the proposed Project require rezoning of agricultural or forest-zoned areas. Therefore, there would be no impact to agriculture and forest resources.

### **Mitigation Measures**

No significant adverse impacts from the proposed Project on agricultural resources would be expected; therefore, no mitigation measures are required.

### 3.0 AIR QUALITY AND GREENHOUSE GAS

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Diminish an existing air quality rule or future compliance requirement resulting in a significance increase in air pollutant(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Significance Criteria

Impacts will be evaluated and compared to the significance criteria in Table 2-1. If impacts equal or exceed any of the following criteria, they will be considered significant.

**Table 2-1. ICAPCD Air Quality Significance Thresholds,  
Ambient Air Quality Standards and Attainment Status**

<b>Mass Daily Thresholds <sup>a</sup></b>		
<b>Pollutant</b>	<b>Construction</b>	<b>Operation</b>
NO <sub>x</sub>	100 lbs / day	55 lbs / day
VOC	75 lbs / day	55 lbs / day
PM <sub>10</sub>	150 lbs / day	150 lbs / day
SO <sub>x</sub>	150 lbs / day	150 lbs / day
CO	550 lbs / day	550 lbs / day
<b>Toxic Air Contaminants</b>		
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance	
GHG	20,000 MT / yr CO <sub>2</sub> eq screening threshold (ICAPCD Rule 903)	
<b>Ambient Air Quality Standards and Attainment Status for Criteria Pollutants</b>		
Ozone 1 - hour 8 - hour	state - nonattainment; federal - nonattainment 0.09 ppm (state) 0.07 ppm (state) and 0.075 ppm (federal)	
NO <sub>2</sub> 1 - hour average Annual arithmetic mean	state - attainment; federal - unclassified/attainment 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM <sub>10</sub> 24 - hour average Annual average	state - nonattainment; federal - nonattainment 10.4 µg/m <sup>3</sup> (construction) and 2.5 µg/m <sup>3</sup> (operation) 1.0 µg/m <sup>3</sup>	
PM <sub>2.5</sub> 24 - hour average	state - attainment; federal - nonattainment 10.4 µg/m <sup>3</sup> (construction) and 2.5 µg/m <sup>3</sup> (operation)	
SO <sub>2</sub> 1 - hour average 8 - hour average	state - attainment; federal - attainment 0.25 ppm (state) & 0.075 ppm (federal - 99th percentile) 0.04 ppm (state)	
Sulfate 14 - hour average	state - attainment 25 µg/m <sup>3</sup> (state)	
CO 1 - hour average 8 - hour average	state - attainment; federal - attainment 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30 - day average Rolling 3 - month average Quarterly average	state - attainment; federal - attainment 1.5 µg/m <sup>3</sup> (state) 0.15 µg/m <sup>3</sup> (federal) 1.5 µg/m <sup>3</sup> (federal)	

a) Source: ICAPCD 2007 CEQA Air Quality Handbook, CARB 2014, and ICAPCD Current Rules and Regulations

KEY: ppm = parts per million; µg/m<sup>3</sup> = microgram per cubic meter; lbs/day = pounds per day; MT/yr CO<sub>2</sub>eq = metric tons per year of CO<sub>2</sub> equivalents, ≥ greater than or equal to, > = greater than Environmental Setting and Impacts

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, process equipment, or control equipment.

The project area is located in Imperial County within the Salton Sea Air Basin. The ICAPCD acts as the regulatory agency for air pollution control in the Salton Sea Air Basin and is the local agency empowered to regulate air pollutant emissions for the plan area.

Under the provisions of the Federal Clean Air Act, the Basin has been classified as non-attainment, attainment, unclassified/attainment or unclassified under the established Federal and State standards. Table 2-1 provides the Federal and California Air Quality Standards as well as the Imperial County Air Basin's designation and classification based on the various criteria pollutants under both state and federal standards.

The Project location has been designated as unclassified/attainment for the National Ambient Air Quality Standards (NAAQS) and State Ambient Air Quality Standards (SAAQS) for carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), and sulfur dioxide (SO<sub>2</sub>). The Project location has been designated as non-attainment for the ozone (O<sub>3</sub>) eight-hour average NAAQS and SAAQS, nonattainment for particulate matter (PM) of 10 micrometers or less (PM<sub>10</sub>) NAAQS and SAAQS, and nonattainment for particulate matter of 2.5 micrometers or less (PM<sub>2.5</sub>) NAAQS.

### ***3. a) Conflict with or obstruct implementation of the applicable air quality plan?***

The ICAPCD is primarily responsible for monitoring air quality within Imperial County, enforcing regulations for new and existing stationary sources within the Imperial County portion of the Salton Sea Air Basin, and planning, implementing and enforcing programs designed to attain and maintain state and federal ambient air quality standards within the ICAPCD. As such, the ICAPCD is required to prepare and maintain an Air Quality Attainment Plan (AQAP) and State Implementation Plan (SIP) to document strategies and measures to be undertaken to reach attainment of ambient air quality standards. While the ICAPCD does not have direct authority over land use decisions, it is recognized that changes in land use and circulation planning are necessary to maintain clean air.

A three tiered approach is used to assess whether a project complies with the air quality attainment plans applicable to the air basin. The Project must comply with all three criteria in order to be consistent with the AQAP. The criteria are: (1) The Project must comply with the thresholds on an individual basis; (2) The Project must comply with the land use planning strategies in the 1991 AQAP; and (3) The Project must comply with all applicable rules and regulations. The Project would be consistent with the AQAP for the following reasons:

1. As indicated in the operational air quality analysis (Section 3.b), no individual thresholds would be exceeded.
2. As indicated in the Project Description, the proposed Project is the decommissioning of the existing WWPT and therefore would not generate any new land use and therefore, would not be inconsistent with the 1991 AQAP.
3. The proposed Project is already in compliance with all ICAPCD Rules and Regulations and will continue to remain compliant during implementation of the proposed WWPT Closure Project.

### ***3. b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?***

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, no new process equipment, and no new control equipment.

### ***Construction Air Quality Impacts***

The ICAPCD makes significance determinations for construction impacts based on the maximum or peak daily emissions during the construction period, which provides a “worst-case” analysis of the construction emissions. The proposed Project would not require new construction activities, or new process equipment, or new control equipment, and therefore no construction emissions are expected from the proposed Project. The proposed Project would involve “de-commissioning” activities of the WWPT, which are being evaluated under the construction thresholds from the following potential criteria pollutant emission sources:

- Mobile Sources
- Stationary Sources
- Lagoon Sources

#### **Mobile Sources**

Mobile source emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2013.2.2 (California Air Pollution Control Officers Association (CAPCOA) 2013). The model inputs were adjusted to reflect a worst-case day in June 2014 for sludge drying and disposal and pond liner excavation as reflected in the WWPT Closure Plan. A worst-case of 10 total truck trips per day were modeled for two categories of truck activity: dump trucks hauling sludge to the landfill and on-site decommissioning equipment. Five dump truck loads per day were modeled travelling 85 miles each way to the South Yuma County Landfill to dispose of sludge. Three excavators and two loaders were modeled operating within the WWPT Closure Project area. No more than one acre was disturbed at any one time. The evaluation included typical dust control (watering three times per day and reduced speed to less than 15 miles per hour) as well as use of Tier 3 equipment (or better); National Beef verified that these measures would be included as part of the WWPT Closure Project. Standard CalEEMod defaults were used for all other aspects of estimating mobile source emissions. PM emissions estimates from CalEEMod include both fugitive dust emissions and exhaust emissions resulting from decommissioning activities. Table 2-2 presents the emissions estimates for mobile sources during the worst-case day in June 2014.

#### **Stationary Sources**

Stationary source emissions were estimated from the activities associated with the WWPT during decommissioning: biogas combustion using the VAREC flare (from bio gas produced at the anaerobic pond); VAREC flare pilot burner (fired on propane); and indirect electricity usage by the WWPT facility. The estimated emissions represent a worst-case day in June 2014.

The indirect electricity emissions were estimated conservatively assuming that WWPT facility uses 20 percent of National Beef Brawley’s total daily electricity consumption. The flare pilot burner emissions were determined using the average daily propane usage for the calendar year 2013 in the absence of June 2014 utility bills. The VAREC flare, which combusts the biogas produced at the anaerobic pond, used the maximum daily volume combusted to reflect the worst-case day in June 2014. Daily maximum volume for the VAREC flare was obtained from the meters installed at the flare and the anaerobic pond. All of the above stationary source emissions used emission factors from AP-42 and 40CFR98 (EPA 2014). Table 2-2 presents the emissions estimates for stationary sources during the worst-case day in June 2014.

**Lagoon Sources**

Lagoon source emissions were estimated using the U.S. Environmental Protection Agency’s (EPA) wastewater treatment model, WATER 9 (version 3.0, released on June 29, 2006); this model consists of analytical expressions for estimating air emissions of individual waste constituents in wastewater collection, storage, treatment, and disposal facilities. Similar to mobile sources, the model inputs were adjusted to reflect a worst case day in June 2014. Process wastewater from equipment cleaning and sanitary usages at the facility were processed only through the facility’s DAF unit-1, anaerobic pond (pond 1), intermediate DAF unit-2, aerobic pond (pond 2) through July 31, 2014. Two clarifying ponds (ponds 3A and 3B) and a SAF which were part of the WWPT were shut down prior to June 2014.

The air emissions from above mentioned wastewater treatment units were estimated using a wastewater flow rate of 0.6 MGD. Key variables which were adjusted in the modeling to reflect the WWPT conditions include: wastewater temperature; treatment unit dimensions; wastewater flow rate; retention time in lagoons; pH; density and percentage of oil content; bio-rate; and air-flow. Methane emissions from bio-gas produced during anaerobic digestion of wastewater at pond 2 are routed to the VAREC flare located at National Beef Brawley (which was assessed above under stationary sources). Table 2-2 presents the emissions estimates for lagoon sources during the worst-case day in June 2014.

**Table 2-2. Summary of Emissions by Source – Worst-Case Day in June 2014**

Emissions Source	Pollutant						
	ROG (lbs/day)	NO <sub>x</sub> (lbs/day)	CO (lbs/day)	SO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	CO <sub>2e</sub> (MT/yr)
Mobile Sources	1.83	25.07	24.11	0.04	1.81	1.35	4,664
Stationary Sources	0.15	28.84	504.45	0.23	12.52	11.52	7,701
Lagoon Sources	0.03	--	--	--	--	--	--
<b>Total</b>	<b>2.01</b>	<b>53.91</b>	<b>528.56</b>	<b>0.27</b>	<b>14.33</b>	<b>12.87</b>	<b>12,365</b>
ICAPCD Daily Threshold	75	100	550	150	150	150	<b>20,000</b>
Is Threshold Exceeded After Mitigation?	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Trinity Consultants Inc. 2014.

Notes: ROG = reactive organic gas, NO<sub>x</sub> = nitrogen oxide, Sox = sulfur oxide, CO<sub>2e</sub> = carbon dioxide equivalent

Because worst-case daily emissions would not exceed any of the criteria air pollutant daily emission thresholds, short-term “de-commissioning” emissions would be less than significant. No mitigations measures would be required.

***Operational Air Quality Impacts***

The estimated emissions from the WWPT Closure Project at the time of completion would only encompass dust emissions from wind erosion where the ponds were previously located. These were estimated at approximately 3 pounds per day based on California Air Resources Board (CARB) emission factors (CARB 1997). Three pounds per day would be well below the 150 pounds per day particulates threshold.

Any operational emissions due to the proposed WWPT Closure Project could potentially come from stationary and mobile sources; however, after the completion of the WWPT Closure Project, there would be no further operations, potential impacts would be less than significant and are not further analyzed.

### 3. c): Cumulative Impacts

The same significance thresholds for project specific significance thresholds are applied to cumulative impacts in this environmental assessment. Projects that exceed the project-specific significance thresholds are considered to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. This approach was upheld by the Court in *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal. App. 4th 327, 334. The Court determined that where it can be found that a project did not exceed the established air quality significance thresholds, the City of Chula Vista properly concluded that the project would not cause a significant environmental effect, nor result in a cumulatively considerable increase in these pollutants. The Court found this determination to be consistent with CEQA Guidelines Section 15064.7, stating, "The lead agency may rely on a threshold of significance standard to determine whether a project will cause a significant environmental effect." The Court found that, "Although the project will contribute additional air pollutants to an existing nonattainment area, these increases are below the significance criteria... Thus, we conclude that no fair argument exists that the project will cause a significant unavoidable cumulative contribution to an air quality impact." See also, *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal. App. 4th 899. Here again, the Court upheld the lead agency's approach to utilizing the established air quality significance thresholds to determine whether the impacts of a project would be cumulatively considerable.

In general, the preceding analyses concluded that air quality impacts from the decommissioning activities associated with implementing the proposed Project would result in less than significant air quality impacts. In addition, CEQA Guidelines Section 15064 (h)(4) states, "The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable." For this reason, air quality impacts are not considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064 (h)(1) and therefore, no significant adverse cumulative construction and operational air quality impacts are expected to occur.

### 3. d): Toxic Air Contaminants

Based on a review of surrounding land uses and existing area development, the proposed project is not expected to affect sensitive receptors. Sensitive receptors are defined as locations where young children, chronically ill individuals, the elderly or people who are more sensitive than the general population reside, such as schools, hospitals, nursing homes and daycare centers. The nearest residential sensitive receptors are more than 1,400 feet south and 2,100 feet west of the proposed WWPT Closure Project site. Figure 2-1 depicts the WWPT Closure Project location and the nearest sensitive receptors.

Health risks are considered wherein a new or modified source of hazardous air pollutants is proposed for a location near an existing residential area or other sensitive receptor when evaluating potential impacts related to hazardous air pollutants. The nearest sensitive receptors are more than 1,400 feet to the south and 2,100 feet to the west of National Beef's WWPT facility; a municipal airport, railroad and industrial zone is located between the WWPT and the nearest sensitive receptors.

Diesel exhaust fumes are the most common source of toxic air contaminants. The WWPT historically was a source of ammonia. The proposed WWPT Closure Project is anticipated to generate no more than 10 truck trips per day (Table 2-1), which is not a substantial source of diesel truck trips. This is based on recent evaluations of toxic air contaminants which support findings that health risks were well below thresholds for predicted potential carcinogenic risk of 10 in a million for projects with higher numbers of truck trips per day and for sensitive receptor locations less than 500 feet. There are very slight and decreasing levels of ammonia emissions from the lagoons; with complete WWPT closure, all ammonia emissions will be eliminated.

Because: (1) the nearest sensitive receptors are more than 1,400 feet to the south and 2,100 feet to the west; (2) the proposed Project would generate no more than 10 diesel truck trips per day; (3) levels of ammonia

emissions are slight and decreasing; and (4) this is not an activity level that would exceed health risk thresholds; the proposed Project was determined to not be a substantial source of hazardous air pollutants. Thus it would have a less than significant health risk impact. Accordingly, no health risk assessment was required to be performed and no mitigation measures are required.

**Figure 2-1. Sensitive Receptors**



**3. e): Odors**

National Beef’s facility historically was a source of odor and nuisance complaints. The last notice of odor violation was issued in November 2013. With implementation of the WWPT Closure Project, all sources of odor complaints have been reduced and will be gone with the complete WWPT closure; any potential odor impacts would be less than significant with implementation of the proposed Project.

**3. f):** see response to 3.b).

**3. g) and h): Greenhouse Gas Emissions**

Global climate change is a change in the average weather of the earth, which can be measured by wind patterns, storms, precipitation, and temperature. Historical records have shown that temperature changes have occurred in the past, such as during previous ice ages. Some data indicate that the current temperature record differs from previous climate changes in rate and magnitude.



The United Nations Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of greenhouse gases (GHGs) needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm carbon dioxide-equivalent concentration is required to keep global mean warming below two degrees Celsius, which is assumed to be necessary to avoid dangerous climate change.

GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The following are the gases that are widely seen as the principal contributors to human-induced global climate change.

- Carbon dioxide (CO<sub>2</sub>)
- Methane (CH<sub>4</sub>)
- Nitrous Oxide (N<sub>2</sub>O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur Hexafluoride (SF<sub>6</sub>)

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The global warming potential is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere (“atmospheric lifetime”). The GWP of each gas is measured relative to carbon dioxide, the most abundant GHG. The definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the heat trapped by one unit mass of CO<sub>2</sub> over a specified time period. GHG emissions are typically measured in terms of pounds or tons of “CO<sub>2</sub> equivalents” (CO<sub>2</sub>e). For example, sulfur hexafluoride is 22,800 times more potent at contributing to global warming than carbon dioxide.

### ***Project GHG Emissions***

CARB has designed a California Cap-and-Trade program that is enforceable and meets the requirements of AB32. The program began on January 1, 2012, with an enforceable compliance obligation beginning with the 2013 GHG emissions inventory. The facility is subject to the requirements of the AB32 Cap and Trade Program as the facility GHG emissions are considered “covered emissions” under the Cap and Trade Program. The proposed Project however does not affect the requirements of AB32, since no change in GHG emissions source types at the facility are expected from implementation of the proposed Project. Therefore, the proposed Project would not conflict with AB32, the applicable GHG reduction plan, policy, and regulations that have been adopted to implement AB32.

The ICAPCD adopted Rule 903, which allows a screening threshold of 20,000 metric tonnes per year (MT/yr) of CO<sub>2</sub>e on all permitted sources. As presented in Table 2-2, the proposed WWPT Closure Project would generate approximately 12,365 MT/yr CO<sub>2</sub>e. Because worst-case daily de-commissioning emissions would not exceed the ICAPCD GHG screening thresholds, estimated GHG emissions would be less than significant. Therefore, no mitigations measures would be required.

### **Mitigation Measures**

No significant adverse impacts from the proposed Project on air quality and GHG would be expected; therefore, no mitigation measures are required.

#### 4.0 BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Significance Criteria

The impacts on biological resources will be considered significant if any of the following criteria apply:

- The project results in a loss of plant communities or animal habitat considered to be rare, threatened or endangered by federal, state or local agencies.
- The project interferes substantially with the movement of any resident or migratory wildlife species.
- The project adversely affects aquatic communities through construction or operation of the project.

#### Environmental Setting and Impacts

**4. a), b), c), d), e), and f):** The proposed Project would be located in a heavy industrial area, entirely within the boundaries of an existing industrial facility. The facility has been fully developed and is essentially void of vegetation. All native habitats have been removed from the site since the site was originally developed. There are on-site detention basins; given it is surrounded by industrial operations, a by-pass, a municipal airport and a railroad, there are no native plants and no anticipated protected habitat. The proposed Project does not include the acquisition of additional land for use by the facility or any new construction within the facility's current boundaries, which further eliminates the potential for biological resource impacts. The Project comprises only

the closure of the WWPT. Because the proposed Project has no flora or fauna or sensitive habitat on or adjacent to the facility, there would be no direct or indirect biological impacts on any sensitive biological species, riparian habitat, or other sensitive natural habitat. The proposed Project would not result in the addition or the elimination of water ponds that could be used by animals or migratory fowl. Further, the proposed Project would not adversely affect federally protected wetlands as defined in Section 404 of the Clean Water Act as there are none on or adjacent to the facility. Because the project site is completely developed and managed as an industrial operation, there are no rare, endangered, or threatened species on the Project site. There are no significant plant or animal resources, locally designated species, natural communities, wetland habitats, or animal migration corridors that would be adversely affected by the proposed Project. The proposed Project would not impact any local policies or ordinances that protect biological resources or conflict with the provisions of a Habitat Conservation Plan or other similar plan. Because the area in and near the Project is devoid of native habitat, impacts to other, non-listed species are not expected; therefore no impacts on biological resources are expected from the proposed Project.

### Mitigation Measures

No significant adverse impacts on biological resources would be expected from the proposed Project; therefore, no mitigation measures are required.

<b>5.0 CULTURAL RESOURCES</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or <b>unique</b> geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

Impacts to cultural resources will be considered significant if:

- The project results in the disturbance of a significant prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group.
- Unique paleontological resources are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

## Environmental Setting and Impacts

**5. a), b), and c):** CEQA Guidelines Section 15064.5 states that resources listed in the California Register of Historical Resources or in a local register of historical resources are considered “historical resources.” Additionally, CEQA Guidelines Section 15064.5(a)(3) states that “generally, a resource shall be considered by the lead agency to be ‘historically significant’ if the resource meets the criteria for listing in the California Register of Historical Resources including the following:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
- Has yielded or may be likely to yield information important in prehistory or history.

The Project is an existing industrial facility in an area zoned for industrial and manufacturing activity and has been previously graded and paved. No cultural resources have been found during past construction projects. The entire Project site has been previously graded and developed. Any archaeological or paleontological resources that may have been present prior to development of the facility are not expected to be found at the site due to past disturbance and no new construction is proposed as part of the Project. Therefore, unique paleontological resources are not expected.

Because there would be no construction, the proposed Project would not cause an adverse change in the significance of a resource listed in the California Register of Historical Resources or in a local register of historical resources; cause substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5; or directly or indirectly destroy a unique paleontological resource, site, or feature.

There are no known prehistoric or historic structures or objects within the facility or adjacent areas. The proposed Project would be located within the confines of the existing facility and would not affect structures in the surrounding area as no construction is required. Previous construction activities at the Project site have not uncovered any archaeological or paleontological resources. Further, there are no existing structures at the facility that are considered architecturally or historically significant by the Imperial County, the City of Brawley or any other group. Therefore, no impacts to historic resources would occur due to the proposed Project.

**5. d):** No known human remains or burial sites have been identified at the Project site during previous construction activities, so the proposed Project is not expected to disturb any human remains. As required by State law, if human remains are unearthed, no further disturbance will occur until the County Coroner has made the necessary findings concerning the origin and disposition of these remains. The Native American Heritage Commission will be notified if the remains are determined to be of Native American descent. However, since there would be no construction as part of the proposed Project, there would be no impact to the disturbance of human remains.

## Mitigation Measures

No significant adverse impacts from the proposed Project on cultural resources would be expected; therefore, no mitigation measures are required.

<b>6.0 GEOLOGY AND SOILS</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
a) Expose people or structures to 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Significance Criteria

The impacts on the geological environment will be considered significant if any of the following criteria apply:

- Topographic alterations would result in significant changes, disruptions, displacement, excavation, and compaction or over covering of large amounts of soil.
- Unique geological resources (paleontological resources or unique outcrops) are present that could be disturbed by the construction of the proposed project.
- Exposure of people or structures to major geologic hazards such as earthquake surface rupture, ground shaking, liquefaction or landslides.
- Secondary seismic effects could occur which could damage facility structures, e.g., liquefaction.
- Other geological hazards exist which could adversely affect the facility, e.g., landslides, mudslides.

### Environmental Setting and Impacts

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the

WWPT system and would include no new construction, process equipment, or control equipment.

Implementation of the proposed WWPT Closure Project includes decommissioning of the wastewater treatment ponds over a four year period as described in Table 1-1. The Project does not include new construction or the installation of equipment that may impact soil or geological resources. The proposed Project is located in the Imperial County, an area of known seismic activity (Imperial Fault Zone). The most significant potential geologic hazard at the proposed Project site is estimated to be seismic shaking from future earthquakes generated by active or potentially active faults in the region. The Project includes the removal of materials in compliance with all rules and regulations applying to hazardous materials management and emergency preparedness and response.

**6. a):** Because: (1) the Project would include neither new construction, nor new process equipment, nor new control equipment; (2) the Project is operating under existing regulatory requirements, as presented in Section 1.6, Related Permits and Regulations, including but not limited to a Hazardous Materials Business Plan, and NPDES Stormwater General Permit; (3) these related permits and regulatory requirements would continue to be in operation through implementation of the proposed Project; and (4) the existing facility was previously designed to comply with Imperial County Building Code (which represents the California Uniform Building Code) requirements for geologic hazards for the Imperial County area; the proposed Project would not expose people or structures to any substantial adverse effects, including impacts from the risk of loss, injury, or death involving the rupture of an earthquake fault, seismic ground-shaking, or seismic-related ground failure. This would be a less than significant geology and soils impact.

**6. b):** Although the proposed Project would involve compliant closure of the existing WWPT system and may involve some ground disturbance and removal of soils, the project would be required to implement dust control measures as required by ICAPCD, and therefore any Project-related impact on soil erosion or topsoil loss would be considered less-than-significant.

**6. c) & d):** Implementation of the proposed Project would involve compliant closure of the existing WWPT system and may involve some ground disturbance and removal of soils. The Project would include decommissioning of the existing WWPT ponds, and therefore there may disturb expansive soil. Because: (1) the proposed Project would include compliant closure of the existing WWPT system; (2) the Project is operating under existing regulatory requirements, as presented in Section 1.6, Related Permits and Regulations, including but not limited to a Hazardous Materials Business Plan and NPDES Stormwater General Permit; (3) these related permits and regulatory requirements would continue to be in operation with implementation of the proposed Project; and (4) the existing WWPT facility was previously designed to comply with Imperial County Building Code requirements for geologic hazards for the Imperial County area; the proposed Project would result in less than significant landslides, lateral spreading, subsistence, collapse or expansive soil impacts.

**6. e):** The Project would include no new construction, process equipment, or control equipment; it is the clean closure of an existing WWPT and therefore would have a less than significant impact on the use of septic tanks or alternative wastewater systems that would release directly to soils.

### *Mitigation Measures*

No significant adverse impacts from the proposed Project on geology and soils would be expected; therefore, no mitigation measures are required.

7.0 HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

The impacts associated with hazards will be considered significant if any of the following occur:

- Non-compliance with any applicable design code or regulation.
- Non-conformance with National Fire Protection Association standards.
- Non-conformance with regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG) 2 levels.

- Exposure to radiant heat exposures in excess of 1,600 British Thermal Units per hour per square foot (Btu/hr/ft<sup>2</sup>) (the level that exceeds one pound per square inch gauge (psig) (the level that would result in partial demolition of houses).
- Flash fire hazard zones that exceed the lower flammable limit (LFL) (the level that would result in a flash fire in the event a flammable vapor cloud was ignited).

## Environmental Settings and Impacts

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, process equipment, or control equipment.

**7. a):** Because: (1) the proposed Project is required to comply with existing regulatory requirements, as presented in Section 1.6, Related Permits and Regulations, including but not limited to: Hazardous Materials Business Plan and Industrial Wastewater Discharge Permit; (2) is not generating a new waste stream; and (3) is not creating additional environmental or fire hazards through the WWPT Closure Project; the proposed Project would create a less than significant hazards impact to the public or the environment through routine transport, use, or disposal of hazardous materials.

**7. b):** The WWPT Closure Project would be required to comply with all applicable rules and regulations through the closure process. Therefore there would not be an increase in exposure of spills from transport of hazardous materials from the National Beef facility. As a result, a new risk of upset through the delivery of increased materials to the facility is not anticipated because: (1) the proposed Project is required to comply with existing regulatory requirements, as presented in Section 1.6, Related Permits and Regulations, including but not limited to: Hazardous Materials Business Plan and Industrial Wastewater Discharge Permit; (2) the closure Project would involve clean closure of the WWPT system; (3) if in the unlikely event that handling of hazardous materials were to arise as part of the Project, all materials are already within the approved National Beef hazardous materials business plan; (4) the Project is not generating a new waste stream; (5) the existing landfill disposal system is expected to be able to accommodate the WWPT Closure project (see Section 15, Solid/Hazardous Wastes); and (6) the facility has no history of fire or hazardous materials spills with any of the items in the hazardous materials business plan. Therefore, the proposed Project's potential hazards impact to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment from the WWPT Closure Project would be less than significant. Furthermore, alteration to existing containment, storage areas and emergency response plans would not be required.

**7. c):** The Project is not located within one-quarter mile of an existing or proposed school site. The proposed Project is not expected to impact school sites from handling hazardous materials or wastes. Hazardous emissions impacts on sensitive receptors, including schools, are included in the health risks evaluated as part of the air quality analysis (see Section 3, Air Quality and Greenhouse Gases). Because there are no schools located within a quarter mile of the Project, there would no hazardous emissions impacts on schools in the immediate area.

**7. d):** CEQA Section 21092.6 requires the lead agency to consult the lists compiled pursuant to Section 65962.5 of the Government Code, managed by the DTSC, to determine whether the project and any alternatives are located on a site which is included on such list. National Beef Brawley's facility is under DTSC management with respect to its Hazardous Materials Business Plan. No new hazardous materials would be introduced during the WWPT Closure Project. Therefore implementation of the proposed Project would have a less than significant impact on the management of hazardous materials pursuant to Section 65962.5.



**7. e & f):** The proposed Project site is located immediately north of the Brawley Municipal Airport, is within an airport land use plan and within two miles of a public or private use airport. However, the proposed Project is the clean closure of the WWPT system in compliance with all rules and regulations especially pertaining to hazardous materials. Because the WWPT Closure Project would be in compliance with all rules and regulations especially pertaining to hazardous materials, there would be a less than significant impact on safety hazards for people residing or working within two miles of an airport that would be affected by the proposed Project.

**7. g):** Because the proposed Project: (1) is required to comply with existing regulatory requirements, as presented in Section 1.6, Related Permits and Regulations, including but not limited to: Hazardous Materials Business Plan and Industrial Wastewater Discharge Permit; (2) is not creating additional environmental or fire hazards through the WWPT Closure Project; and (3) is not required to update existing emergency response plans; the proposed Project would not impair implementation of or physically interfere with emergency response plans or emergency evacuation plans and therefore would have a less than significant impact.

**7. h):** The proposed Project would not increase the existing risk of fire hazards in areas with flammable brush, grass, or trees. The proposed Project does not expose people or structures to wild land fires. Further, the proposed Project is not located in an area where residences are intermixed with wild lands. No substantial or native vegetation exists within the operational portions of the Project site. Therefore, the proposed Project would not impact people or structures due to fire hazards from wild land fires.

### Mitigation Measures

The effects of an accidental release of hazardous material being stored, used, or transported from the proposed Project would be less than significant. Therefore, no mitigation measures are necessary.

<b>8.0 HYDROLOGY AND WATER QUALITY</b>				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Significance Criteria

Potential impacts on water resources will be considered significant if any of the following criteria apply:

### *Water Quality*

- The project will cause degradation or depletion of ground water resources substantially affecting current or future uses.
- The project will cause the degradation of surface water substantially affecting current or future uses.
- The project will result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.
- The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system are not sufficient to meet the needs of the project.
- The project results in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The project results in alterations to the course or flow of floodwaters.

### *Water Demand*

- The existing water supply does not have the capacity to meet the increased demands of the project, or the project would use a substantial amount of potable water.
- The project increases demand for water by more than five million gallons per day.

## Environmental Setting and Impacts

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, process equipment, or control equipment. Table 1-2 summarizes that with implementation of the proposed WWPT Closure Project water usage would be decreasing from 56,000 to 300 gallons per day and effluent flow (wastewater) decreasing from 83,000 to 300 gallons per

day.

**8. a):** Because: (1) the proposed WWPT Closure Project is the clean closure of an existing WWPT system; and (2) there would be a decrease in water demand and wastewater generation used by the proposed Project; implementation of the proposed WWPT Closure Project would not violate any water quality standards or discharge requirements and the proposed Project would have a less-than-significant impact on water quality standards and waste discharge requirements.

**8. b), c) & d):** Because the proposed Project: (1) would not impact the groundwater supply; (2) would include clean closure of the WWPT system, including soils testing and removal of any soil not meeting rules and regulations; and (3) would only work within the existing WWPT system area and not alter the course of a stream or river; the proposed Project would have no impact on drainage and the drainage patterns of the Project site.

**8. e):** Because: (1) the proposed Project would substantially decrease how much water is used at the facility as a result of the WWPT Closure Project; (2) would not affect the drainage of runoff from rain; and (3) would not require the construction of any new storm drainage facilities; the proposed Project therefore would have a less than significant impact on existing stormwater drainage systems. Also, the proposed Project would not provide substantial additional sources of polluted runoff and therefore, would have a less than significant impact on Project site drainage patterns.

**8. f):** Because: (1) the proposed Project is required to comply with existing regulatory requirements, as presented in Section 1. 6, Related Permits and Regulations, including but not limited to: a Hazardous Materials Business Plan and NPDES Stormwater General Permit; and (2) the proposed Project is expected to continue to comply with all applicable rules and regulations; the proposed Project would not degrade water quality, and would therefore have a less than significant water quality impact.

**8. g), & h):** Because: (1) there would be no new Project-related construction, there would be no new housing or new structures within a 100-year flood hazard area; and (2) the proposed Project would not add new structures that would impede or redirect flood flows; the project would have no new flood hazard impact.

**8. i), & j):** If the proposed Project were in an area struck by a natural disaster that would create a flood, seiche, tsunami, or mudflow, it could expose people or structures to risks as a result of flooding (due to failure of a levee or a dam) or seiche, tsunami, or mudflow (caused by earthquake or other natural disaster). Because: (1) there would be no new Project-related construction; (2) the proposed Project is required to comply with existing regulatory requirements, as presented in Section 1. 6, Related Permits and Regulations, including but not limited to a Hazardous Materials Business Plan, Spill and Emergency Response Action Plan; and (3) the Project is expected to continue to comply with all applicable rules and regulations in the event of natural disasters caused by earthquakes, storms, and flooding; the Project would therefore have a less than significant flooding and inundation impact from natural disasters such as flooding, seiche, tsunami, or mudflow.

## Mitigation Measures

No significant adverse impacts from the proposed Project on hydrology and water quality would be expected; therefore, no mitigation measures are required.

9.0 LAND USE AND PLANNING	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Significance Criteria

Land use and planning impacts will be considered significant if the project conflicts with the land use and zoning designations established by the City of Brawley.

### Environmental Setting and Impacts

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, no new process equipment, and no new control equipment.

**9. a):** Because the proposed WWPT Closure Project would occur entirely within the boundaries of the existing National Beef facility and, therefore, would not disrupt or divide an established community, it would therefore have no land use impact on dividing an established community.

**9. b):** Because the WWPT Closure Project: (1) would not trigger any land use or building permits or modifications; and (2) would not result in any conflicts with the City of Brawley’s General Plan; the City of Brawley would have no land use changes or permits to process. Because the proposed WWPT Closure Project at the National Beef facility is not expected to conflict with any applicable land use plan, policy or regulation, there would be a less-than-significant land use impact.

### Mitigation Measures

No significant adverse impacts from the proposed Project on land use and planning would be expected; therefore, no mitigation measures are required.

<b>10.0 MINERAL RESOURCES</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

Project-related impacts on mineral resources will be considered significant if any of the following conditions are met:

- The project would 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.
- The proposed project results 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.

### Environmental Setting and Impacts

**10. a), & b):** Because: (1) the proposed WWPT Closure Project would not involve any new construction; and (2) therefore would not change access to any potential mineral resource in the vicinity of the National Beef facility; the proposed Project would result in no impact to the potential loss of availability of natural gas or any other mineral resources of value locally, to the region and residents of the state.

### Mitigation Measures

No significant adverse impacts from the proposed Project on mineral resources would be expected; therefore, no mitigation measures are required.

<b>11.0 NOISE</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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## Significance Criteria

Impacts on noise will be considered significant if:

- Construction noise levels exceed the City of Brawley noise ordinance or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three decibels (dBA) at the site boundary. Construction noise levels will be considered significant if they exceed federal Occupational Safety and Health Administration (OSHA) noise standards for workers.
- The proposed project operational noise levels exceed any of the local noise ordinances at the site boundary or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three dBA at the site boundary.
- The proposed project equipment will generate noise greater than 90 decibels (dB) at the property line.

## Environmental Setting and Impacts

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, no new process equipment, and no new control equipment. The proposed Project could generate up to 5 to 10 truck trips per day (Table 1-2).

Noise is generally defined as loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity, and that interferes with or disrupts normal activities. Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise exposure levels is annoyance. The responses of individuals to similar noise events are diverse and are influenced by many factors, including the type of noise; the perceived importance of the noise; its appropriateness to the setting; the time of day and the type of activity during which the noise occurs; and individual noise sensitivity. Sound is a physical phenomenon consisting of minute vibrations that travel through a medium, such as air, and are sensed by the human ear.

Sound is generally characterized by several variables, including frequency and amplitude. The standard unit of sound pressure measurement is the decibel (dB). Sound from a tuning fork contains a single frequency (a pure tone), but most sounds one hears in the environment do not consist of a single frequency but rather a broad band of many frequencies differing in sound level. Because of the broad range of audible frequencies, methods have been developed to quantify these values into a single number. Human hearing is less sensitive at low frequencies and extremely high frequencies than at the mid-range frequencies. This process of discriminating frequencies based upon human sensitivity is termed “A-weighting,” and the resulting dB level is termed the “A-weighted” decibel (dBA). A-weighted sound pressure levels of typical sources of noise are shown in

Table 2-3.

**Table 2-3. Sound Levels of Typical Noise Sources and Noise Environments**

Noise Source (at a given distance)	Scale of dBA Sound Levels	Noise Environment	Human Judgment of Noise Loudness (Relative to a Reference Loudness of 70 dBs*)
Commercial Jet Take-Off (200 feet)	120		Threshold of pain *32 times as loud
Pile Driver (50 feet)	110	Rock Music Concert	*16 times as loud
Ambulance Siren (100 feet) Newspaper Press (5 feet) Power Lawn Mower (3 feet)	100		Very loud *8 times as loud
Motorcycle (25 feet) Propeller Plane Flyover (1,000 feet) Diesel Truck, 40 mph (50 feet)	90	Boiler Room Printing Press Plant	*4 times as loud
Garbage Disposal (3 feet)	80	High Urban Ambient Sound	*2 times as loud
Passenger Car, 65 mph (25 feet) Vacuum Cleaner (10 feet)	70		Moderately loud *70 decibels (Reference loudness)
Normal Conversation (5 feet) Air Conditioning Unit (100 feet)	60	Data Processing Center Department Store	*1/2 as loud
Light Traffic (100 feet)	50	Private Business Office	*1/4 as loud
Bird Calls (distant)	40	Lower Limit of Urban Ambient Sound	Quiet *1/8 as loud
Soft Whisper (5 feet)	30	Quiet Bedroom	
	20	Recording Studio	Very quiet
	10		
	0		Threshold of hearing

Source: URS Corporation (2007).

Notes: dB = decibel, dBA = A-weighted decibel, mph = miles per hour

Under the Occupational Safety and Health Act of 1970 (Title 29 United States Code § 651 et seq.), the Department of Labor, OSHA has adopted regulations designed to protect workers against the effects of occupational noise exposure (Title 29 Code of Federal Regulations § 1910.95). These regulations list permissible noise exposure levels as a function of the amount of time during which the worker is exposed.

California Government Code Section 65302(f) encourages each local governmental entity to perform noise studies and implement a noise element as part of its general plan. In addition, the California Office of Planning and Research has published guidelines for preparing noise elements, which include recommendations for evaluating the compatibility of various land uses as a function of community noise exposure. The City of Brawley (General Plan) and Imperial County (General Plan Noise Element and Noise Ordinance) have established the regulatory noise framework through noise compatibility guidelines for the proposed WWPT

Closure Project. The Project is located north of the airport in an industrial zone and is in noise Zone C; this represents a high noise area in which no development is discouraged.

Construction equipment are limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. Saturday. No commercial construction operations are permitted on Sunday or Holidays.

The proposed Project would include no construction or any increase in the operational processes. It would decommission an existing WWPT. The proposed Project could generate up to 5 to 10 truck trips per day (Table 1-2).

**11. a), b), c) & d):** The proposed Project is entirely located within the existing boundaries of the existing National Beef facility, a highly industrialized area, and no noise-sensitive receptors immediately adjoin the WWPT part of the facility. The existing ambient noise environment is dominated by the Brawley Municipal Airport (to the south), the Brawley By-Pass (to the north and east), and a railroad and other industrial activities (to the west.)

The proposed Project would generate up to five to ten trucks per day during the various WWPT decommissioning phases; the potential additional noise levels from the five to ten daily trucks is expected to be absorbed within the existing background noise being generated by the existing airport and freeway, rail, local industrial and traffic noise sources.

On-site vehicle movement of is not expected to substantially affect the existing conditions industrial noise environment. Therefore, because the existing noise environment is expected to dominate any noise generated during the decommissioning of the WWPT Closure project, the Project-related noise levels are expected to be less than significant.

**11. e) & f):** The proposed Project is located immediately north of the Brawley Municipal Airport. The proposed Project is the closure of an existing WWPT within National Beef’s facility. The airport operations would not affect noise levels at the Project site; the proposed WWPT Closure Project would result in less than significant impact to noise levels to and from the airport or airstrip.

## Mitigation Measures

No significant adverse impacts from the proposed Project on noise would be expected; therefore, no mitigation measures are required.

<b>12.0 POPULATION AND HOUSING</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

### Significance Criteria

The impacts of the proposed project on population and housing will be considered significant if the following criteria are exceeded:

- The demand for temporary or permanent housing exceeds the existing supply.
- The proposed project produces additional population, housing or employment inconsistent with adopted plans either in terms of overall amount or location.

### Environmental Setting and Impacts

**12. a), b), & c):** The proposed Project would be the decommissioning of the existing WWPT. There would be no new construction activities at the proposed Project site. Therefore there would be no relocation of individuals, impact to housing or commercial facilities, or change in the distribution of the population due to the proposed Project. Because: (1) the proposed Project would occur at an existing industrial facility; (2) it is the decommissioning of an existing WWPT; and (3) there would be no new construction and therefore no displacement of housing; the proposed Project is expected to have less than significant impacts on population, population distribution, or housing.

### Mitigation Measures

No significant adverse impacts from the proposed Project on population and housing would be expected; therefore, no mitigation measures are required.

<b>13.0 PUBLIC SERVICES</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Significance Criteria

Impacts on public services will be considered significant if the project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives.

## Environmental Setting and Impacts

**13. a) Fire Protection:** The City of Brawley Fire Department provides fire protection to the existing National Beef facility and WWPT. National Beef already has an emergency preparedness plan in place in the event of fires or another emergency and which would apply to the WWPT Closure Project. In addition, the proposed project would not include any new construction or new operations as it is the decommissioning of the existing WWPT. The nearest City of Brawley fire station is the Brawley Fire Department Station 2 at 1505 Jones Street, Brawley California, immediately south of the Brawley Municipal Airport and the proposed WWPT Closure Project.

Because: (1) the proposed Project must already comply with all applicable code and ordinance requirements for access, water mains, fire flows and fire hydrants; (2) the proposed Project is already served by emergency response service by City of Brawley Fire Department; (3) the proposed Project area already accommodates large trucks and thus should adequately accommodate fire protection vehicles; and (4) the facility has already an emergency preparedness plan in place; the proposed Project is anticipated to have a less-than-significant impact on fire services

**13. b) Police Protection:** The City of Brawley Police Department provides law enforcement services for the Project area. Law enforcement units continuously patrol the entire community over a 24-hour period. In addition, the existing National Beef facility is fenced with entry and exit controlled at an existing security gate.

This project is an existing industrial activity within an existing industrial area. Because: (1) the proposed Project is not including any new construction activities; and (2) it is already within a secured facility; the proposed Project is anticipated to have less than significant impact upon the usability, adequacy and responsiveness of existing law enforcement services within the City of Brawley.

**13. c) Schools:** There would be no new construction activities as part of the proposed Project. Because: (1) the Project is the closure of the existing WWPT and would not generate any new long-term employees; and (2) the proposed WWPT Closure Project would not involve the relocation of individuals, impact housing or change the distribution of the population; the proposed Project would not alter existing, or require additional schools and the proposed Project would have a less than significant impact on school services.

**13. d) Other Public Facilities:** No other public service agencies or facilities were identified that could be affected by the proposed Project with the possible exception of public roadways. Because there would be no Project-related new construction, and Project decommissioning is anticipated to generate no more than 5 to 10 daily truck trips, it is expected that existing roadways could accommodate a minor increase in daily traffic levels without construction of new roadways. Therefore, the proposed Project would not affect the maintenance of public roadways, nor would it create an increase in demand for additional public roadways. Since the proposed Project would not increase the demand for additional public services or facilities, it is not expected to affect service ratios, response times, or other performance objectives, and therefore would have a less than significant impact on other public facilities.

The proposed WWPT Closure Project would not result in the development of new housing or an increase in residents. It is a WWPT Closure Project. It is therefore anticipated to have less than significant impacts on fire protection, police protection, school, or any other public services. No mitigation measures are required.

## Mitigation Measures

No significant adverse impacts from the proposed Project on public services would be expected; therefore, no mitigation measures are required.

14.0 RECREATION	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

The impacts to recreation will be considered significant if:

- The project results in an increased demand for neighborhood or regional parks or other recreational facilities.
- The project adversely affects existing recreational opportunities.

### Environmental Setting and Impacts

**14. a) & b):** The proposed WWPT Closure Project would not increase the demand for neighborhood or regional parks, or other recreational facilities in the area since the proposed Project is not expected to increase the local population. In addition, the proposed Project would not include new recreational facilities, require expansion of existing recreational facilities or adversely affect recreational services since it is not expected to increase the local population in any way.

### Mitigation Measures

Because the proposed Project would neither increase the demand for recreational facilities nor require the construction of any recreational facilities, there would be no recreation impact; therefore, no mitigation measures are required.

<b>15.0 SOLID/HAZARDOUS WASTE</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
a) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Significance Criteria

The proposed project impacts on solid/hazardous waste will be considered significant if the following occur:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.

### Environmental Setting and Impacts

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, no new process equipment, and no new control equipment. The WWPT Closure is anticipated to generate approximately 26,000 cubic yards of landfill waste. National Beef Brawley has historically been disposing its belt pressed sludge to the South Yuma County Landfill, 85 miles to the east of the WWPT Closure Project. The proposed Project would continue to dispose its sludge to the South Yuma County Landfill at rate of no more than 100 cubic yards per day (which is approximately equivalent to the previous disposal rate for WWPT sludge). This maximum disposal rate for sludge would include no more than five dump truck loads per day (at 20 cubic yards per load).

**15. a) & b):** The proposed Project is the clean closure of the existing WWPT system and is anticipated to generate approximately 26,000 cubic yards of sludge waste stream bound for the South Yuma County Landfill. This landfill has historically been receiving the sludge disposals from the National Beef WWPT system and will have the capacity for the proposed WWPT Closure Project (Legaspi personal communications). Because: (1) clean closure of the WWPT includes complying with all regulatory and solid waste disposal requirements; and (2) South Yuma County Landfill has the capacity to accommodate 26,000 cubic yards of solid waste to its landfill facility; the proposed WWPT Closure Project would have a less than significant solid waste impact.

### Mitigation Measures

No significant impacts to waste disposal generated or disposed of would be expected; therefore no mitigation measures are required.

<b>16.0 TRANSPORTATION/TRAFFIC</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
Would the project:				

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the importance of the circulatory system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulatory system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Significance Criteria

The impacts on transportation/traffic will be considered significant if any of the following criteria apply:

- Peak period levels on major arterials are disrupted to a point where level of service (LOS) is reduced to D, E or F for more than one month.
- An intersection's volume to capacity ratio increases by 0.02 (two percent) or more when the LOS is already D, E or F.
- A major roadway is closed to all through traffic, and no alternate route is available.
- There is an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.
- The demand for parking facilities is substantially increased.
- Water borne, rail car or air traffic is substantially altered.
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.

## Environmental Setting and Impacts

The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, process equipment, or control equipment. The proposed Project could increase daily traffic by up to 5 to 10 truck trips per day (Table 1-2).

The operations of roadway segments and intersections are described with the term "level of service" (LOS). LOS is a qualitative assessment of the motorists' and passengers' perceptions of traffic conditions. Six service levels are defined by the Transportation Research Board, designated by letters ranging from "A" for most favorable "free flow" conditions to "F" for least favorable. LOS E corresponds to conditions nearing "at-capacity"

operations. Within the City of Brawley, LOS C is the lowest acceptable operations at area intersections during peak-hours (Brawley 2012).

**16. a) & b):** There would be no new construction activities. The decommissioning of the proposed Project would generate up to 5 to 10 truck trips per day (Table 1-2). These additional trips would be spread out over an 8-hour period. Because: (1) there would be no new construction trips; (2) the decommissioning trips would likely be 5 to 10 truck trips per day; and (3) these trips would have no measurable effect on peak hour regional roadway operations or local area intersection operations; the proposed project would have a less than significant impact on applicable plans, ordinances and policies, or congestion management plans.

**16. c):** The nearest airport, Brawley Municipal, is immediately south from the National Beef facility and the WWPT Closure Project. The proposed Project would include no new construction and would only generate 5 to 10 truck trips per day during decommissioning. Further, no materials have been nor would be expected to access or leave the plant via air travel; therefore implementation of the proposed project would have a less than significant impact on area air traffic levels or patterns.

**16. d) & e):** The proposed Project is not expected to substantially increase traffic hazards or create incompatible uses at or adjacent to the site (see Section 3, Air Quality and Greenhouse Gas, and Section 7, Hazards and Hazardous Materials for further discussions of potential effects from transport of hazardous materials). The proposed Project does not include construction of roadways on-site or off-site that could include design hazards. Emergency access at the National Beef Brawley facility and the WWPT Closure Project location would not be impacted by the proposed Project in that no on-site roadways would be altered as a result of the proposed Project and National Beef Brawley would continue to maintain the existing emergency access gates to its facility. Therefore, the proposed Project would have less than significant impacts to emergency response plans.

**16. f):** Because implementation of the proposed project would not directly affect area roadways and therefore bicycle facilities, bus turnouts or other means of facilitating alternative transportation, the proposed Project would have a less than significant impact on adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks).

## Mitigation Measures

No significant impacts to transportation/traffic would be expected; therefore no mitigation measures are required.

17.0 MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

**17. a):** The proposed Project would not have the potential to adversely affect the quality of the environment, reduce or eliminate any plant or animal species, or destroy prehistoric records. The proposed Project is located at a site that is part of an existing industrial facility, and does not contain biological resources. The National Beef WWPT has been previously disturbed, graded, and developed, and the proposed WWPT Closure Project would not extend into environmentally sensitive areas, but would remain within the confines of an existing National Beef WWPT facility. For additional information, see Section 4.0, Biological Resources and Section 5.0, Cultural Resources.

**17. b):** The proposed WWPT Closure Project includes implementing the WWPT Facility Closure Work Plan and the WWPT Final Effluent Work Plan. The Project would take approximately four years to reach clean closure of the WWPT system and would include no new construction, no new process equipment, and no new control equipment. The proposed Project could increase daily traffic by up to 5 to 10 truck trips per day (Table 1-2).

CEQA Guidelines Section 15064(h)(1) requires that a “lead agency consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.” Where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, a lead agency need not consider the effect significant, but must briefly describe the basis for concluding the incremental effect is not cumulatively considerable. Therefore the Project’s contribution to air quality, hazards, noise, and traffic and all other environmental topics evaluated in this Initial Study/Negative Declaration are not cumulatively considerable and thus, are not significant. As stated above, projects that exceed the project-specific significance thresholds are considered by the Regional Board to be cumulatively considerable. Projects that do not exceed the project-specific significance thresholds are not considered to be cumulatively considerable. The analysis in the Initial Study/Negative Declaration found no significant impacts. Therefore, there would be no significant adverse cumulative impacts expected due to the proposed WWPT Closure Project.



Furthermore, the Court in *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal. App. 4th 327, 334, determined that where it can be found that a project did not exceed the lead agency's established air quality significance thresholds, the City of Chula Vista properly concluded that the project would not cause a significant environmental effect, nor result in a cumulatively considerable increase in these pollutants. The court found this determination to be consistent with CEQA Guidelines Section 15064.7, stating, "The lead agency may rely on a threshold of significance standard to determine whether a project will cause a significant environmental effect." Thus, it may be concluded that the project will not cause a significant unavoidable cumulative contribution to an air quality impact.

Because: (1) the Project impacts are not significant; and (2) the CEQA Guidelines Section 15064 (h)(4) notes the "mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed Project's incremental effects are cumulatively considerable;" the project's less than significant impacts are not cumulatively considerable.

**17. c):** Based on the response to questions provided above in Sections 1 through 16, the proposed WWPT Closure Project would not cause any direct or indirect adverse effects on human beings or the environment. Therefore, no mitigation measures have been required.

#### **Colorado River Basin Water Board**

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#### **National Beef**

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## 4. REFERENCES

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- Brawley, City of, 2008. City of Brawley Final General Plan Update, 2030. Prepared for the City of Brawley. Prepared by ICF Jones & Stokes. September 2008.
- , 2012. City of Brawley Final Service Area Plan.
- , 2013. City of Brawley Official Zoning Map. Updated February 2013.
- CARB. 2014. website – Background Emissions and Greenhouse Gas Data, Website accessed by V. Rosenkrantz, August 2014. <http://www.arb.ca.gov/homepage.htm>.
- , 2007. Section 7.2 Windblown Dust – Agricultural Lands (Revised July 1997).
- California Air Pollution Control Officers Association (CAPCOA). 2013. California Emissions Estimator Model tm (CalEEMod), version 2013.2.2, released October 2013.
- California Environmental Quality Act (CEQA). 2012. (Public Resources Code 21000 to 21177) and CEQA Guidelines (California Code of Regulations Title 14, Division 6, Chapter 3, Sections 15000 – 15387). <http://ceres.ca.gov/ceqa/guidelines/>
- California, State of, Governor's Office of Planning and Research. CEQA Guidelines, 2012. <http://ceres.ca.gov/ceqa/guidelines/>
- HR Green, Inc., 2014a. Wastewater Pretreatment Facility Closure Workplan. Wastewater Pretreatment Facility, National Beef, Brawley, California. June 4, 2014.
- , 2014b. Wastewater Pretreatment Facility Final Effluent Workplan. Wastewater Pretreatment Facility, National Beef, Brawley, California. June 4, 2014.
- Imperial County Air Pollution Control District, 2007. CEQA Air Quality Handbook.
- Legaspi, E., 2014. Personal communications with V. Rosenkrantz on September 3, 2014. Email correspondence confirming adequate landfill capacity for sludge disposal.
- Local Government Operations Protocol, 2010. For the Quantification and Reporting of Greenhouse Gas Emissions Inventories. Version 1.1. Tables G.6 and G.7. May 2010.
- Ludwig, Bug. 2014. National Beef Environmental Compliance Manager. Various teleconferences and emails including utility or operating data for June 2014 with C. Lee, V. Rosenkrantz and P. Sharma of Trinity Consultants Inc. from April through September 2014.
- URS. 2007. Compilation of Sound Levels from Various Noise Sources. Published in URS, 2013, Noise Analysis for the Wasco Coal Terminal.
- U.S. Environmental Protection Agency's (EPA), 2006. Wastewater Treatment Model, WATER 9 version 3.0. Released on June 29, 2006.
- , 2014. AP-42. Compilation of Air Pollutant Emission Factors. Chapter 1 Section 5 (Liquefied Petroleum Gas - Contribution), Table 1.5-1. Chapter 13 Section 5 (Industrial Flares), Table 13.5-1. Site accessed by P. Sharma in August and September 2014. <Http://www.epa.gov/ttnchie1/ap42/>

## 5. ACRONYMS

ACRONYMS	DEFINITION
AQAP	Air Quality Attainment Plan
BOD	biochemical oxygen demand
CAPCOA	California Air Pollution Control Officers Association
CalEEMod)	California Emissions Estimator Model
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CH <sub>4</sub>	methane
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
CO	carbon monoxide
DAF	dissolved air floatation
dB	decibel
dBA	"A-weighted" decibel
DTSC	California Department of Toxics Substance Control
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gas
GPM	gallons per minute
GWP	global warming potential
HFCs	hydrofluorocarbons
ICAPCD	Imperial County Air Pollution Control District
LOS	Level of Service
MG	million gallons
MGD	million gallons per day
NAAQS	National Ambient Air Quality Standards
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	Nitrogen oxide
N <sub>2</sub> O	nitrous oxide
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Health & Safety Administration
O <sub>3</sub>	ozone
PM	particulate matter
PM <sub>2.5</sub>	particulate matter of 2.5 micrometers or less
PM <sub>10</sub>	particulate matter of 10 micrometers or less
PFCs	perfluorocarbons
POTW	Publically Owned Treatment Works
ROG	Reactive Organic Gas
SAAQS	State Ambient Air Quality Standards
SAF	suspended air floatation
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SF <sub>6</sub>	sulfur hexafluoride
WWPT	Wastewater Pre-Treatment facility