



**San Joaquin Valley Unified  
Air Pollution Control District**

**Nations Petroleum (California) LLC**

**(Project Numbers: S1080106)**

**Initial Study and Mitigated  
Negative Declaration**

May 2008

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SEYED SADREDIN

# INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

## **Nations Petroleum (California) LLC**

May 2008

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Fresno CA 93726-0244

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Project Sponsor  
And Location: Nations Petroleum (California) LLC  
3400 Calloway Drive  
Bakersfield, CA 93312

Project Contact: Joe Selgrath, Consultant  
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## **I. INTRODUCTION**

The San Joaquin Valley Unified Air Pollution Control District (District) has received an Authority to Construct (ATC) application from Nations Petroleum (California) LLC to modify an existing Thermally Enhanced Oil Recovery (TEOR) operation such that the vapors collected from the well heading casing vent can be incinerated in District permitted steam generators, and installation of eleven steam generators to assist the TEOR operation (hereafter referred to as Project).

## **II. PURPOSE AND AUTHORITY**

The District has discretionary approval power over the Project via its Permits Rule (Rule 2010) and New and Modified Stationary Source Review Rule (Rule 2201). No other Agency is known to have discretionary approval over the Project. As such, the District is the public agency having principal responsibility for approving the Project and serves as Lead Agency, California Environmental Quality Act (CEQA), California Code of Regulation (CCR) Guidelines §15367.

The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in Projects through use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the Project in the manner the agency chose if significant environmental effects are involved.

Under CEQA the Lead Agency is required to:

- Conduct preliminary reviews to determine if applications are subject to CEQA [CCR] §15060].
- Conduct reviews to determine if Projects are exempt from CEQA [CCR §15061].
- Prepare Initial Studies for Projects that may have adverse environmental impacts [CCR §15063].
- Determine the significance of the environmental effects caused by the Project [CCR §15064].
- Prepare Negative Declarations or Mitigated Negative Declarations for Projects with no significant environmental impacts [CCR §15070].
- Prepare, or contract to prepare, EIRs for projects with significant environmental impacts [CCR §15081].
- Adopt reporting or monitoring programs for the changes made to Projects or conditions of Project approval, adopted in order to mitigate or avoid significant effects on the environment [PRC §21081.6 & CCR §15097].
- Comply with CEQA noticing and filing requirements.

### III. PROJECT BACKGROUND INFORMATION

#### Project Description

Nations Petroleum (California) LLC (Nations) is in the business of producing crude oil. The District has received an Authority to Construct (ATC) application from Nations to modify and install the following: modifications to existing fixed roof wash tanks; modify an existing Thermally Enhanced Oil Recovery (TEOR) operation such that the vapors collected from the well heading casing vent can be incinerated in District permitted steam generators; and installation of eleven steam generators to assist the existing TEOR operation. Fuel gas will be combusted in steam generators to produce steam for injection into heavy crude oil bearing strata via injection wells to reduce the viscosity of the crude oil, thereby facilitating thermally enhanced oil production.

#### Project Location

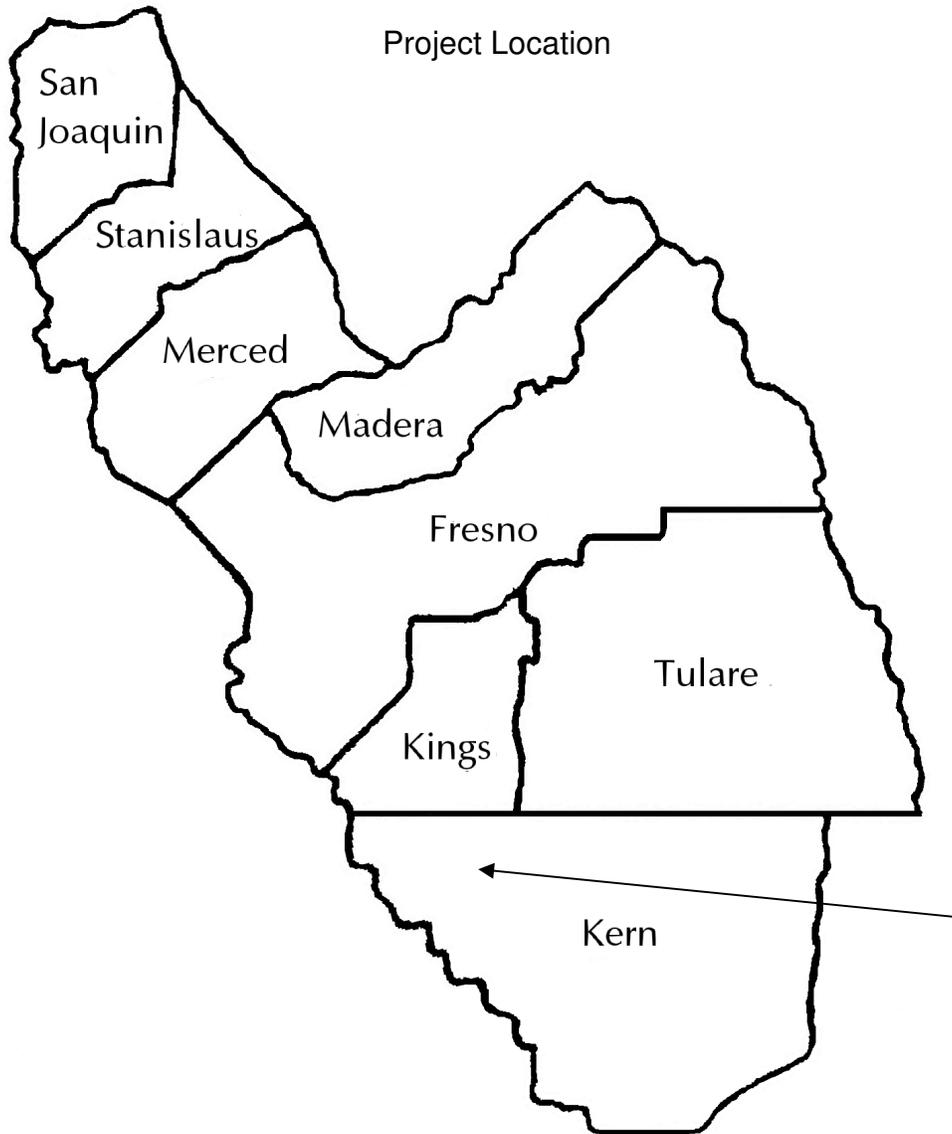
Figure 1 indicates the facility's regional location within the San Joaquin Valley Air Basin (SJVAB). This facility produces crude oil and according to the applicant, and there are no K-12 school within 1,000 feet of the facility boundaries'. Therefore, a school notice, under California Health & Safety Code 42301.6, is not required. The permitted locations for the steam generators are as follows:

S-4073-65 thru '-71: NW ¼ of Section 2, T26S, R20E

S-4073-72 thru '-75: NE ¼ of Section 11, T26S, R20E

Figure 1

Regional Location within the San Joaquin Valley Air Basin (SJVAB)



#### **IV. DECISION TO PREPARE A MITIGATED NEGATIVE DECLARATION**

The District determined that no other agency has broader discretionary approval power over the Project and that the District is the first agency to act on the Project, therefore establishing the District as the Lead Agency for the Project {CEQA Guidelines §15051(b)}. The District's Engineering Evaluation of the Project, incorporated herein by reference, determined that compliance with District rules and permit conditions would mitigate the Project's potential significant impact on air quality to less than significant. After preparation of an Initial Study the District determined that the project would not have a significant, adverse environmental impact and concluded that preparation of a Mitigated Negative Declaration is appropriate for the Project.

**F. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The environmental factors checked below would be potentially affected by the proposed Project, involving at least one impact that is a “Potentially Significant Impact” or “Potentially Significant Unless Mitigated”, as indicated by the checklist on the following pages.

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

**G. DETERMINATION**

I certify that the Project was independently reviewed and analyzed and that this document reflects the independent judgment of the District.

- I find that the proposed Project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described have been added to the Project. A MITIGATED NEGATIVE DECLARATION has been prepared.
- I find that the proposed Project may have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed Project may have a significant effect(s) 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, if the effect is a “potentially significant impact” or “potentially significant unless mitigated.” An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Printed name:  Rick McVaigh

Title:  Deputy APCO

## H. ENVIRONMENTAL IMPACT CHECKLIST

I. AESTHETICS Would the Project;	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Affect a scenic vista or scenic highway?				X
b) Have a demonstrable negative aesthetic effect?				X
c) Create light or glare?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and will not change any element of the scenic vista. The construction and operation of the Project would not significantly alter the existing general industrial appearance of the site. The Project is consistent with existing site usage. There is minimal additional lighting for the proposed eleven steam generators. Thus, the Project would not have an impact on environmental elements, (a through c), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

II. AGRICULTURAL RESOURCES Would the Project;	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility: Therefore, no conversion of farmland will occur. The surrounding property is not under the Williamson Act. Therefore, the Project would not have an impact on environmental elements, (a through c), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

III. AIR QUALITY Would the Project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?				X
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		X		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		X		
d) Expose sensitive receptors to substantial pollutant concentrations?				X
e) Create objectionable odors affecting a substantial number of people?				X

**Discussion:** The Project site is within the San Joaquin Valley Air Basin, which has been classified as “Non-attainment” for ozone and respirable particulate matter (PM-10 and PM-2.5) as defined by the Federal Clean Air Act. The San Joaquin Valley Air Pollution Control District has been established by the State of California in an effort to control and minimize air pollution. As such, the District maintains permit authority over stationary sources of air pollution.

Nations Petroleum (California) LLC has submitted an Authority to Construct (ATC) application to the District. The District has prepared an Authority to Construct (ATC) Application Review, (Project Number: S-1080106), incorporated herein by reference, in which the District evaluates Project related emissions. Project-related emissions are characterized as being criteria pollutants or nuisance odors. Criteria pollutants, identified as oxides of nitrogen (NOx), oxides of sulfur (SOx), particulate matter (PM10), carbon monoxide (CO), and volatile organic compounds (VOC), are quantifiable and thresholds have been established to determine their significance. Nuisance odors are not quantifiable and can only be evaluated in a qualitative manner.

Per District Authority to Construct Application No: S-4073-5-1, -7-1; -9-1, -42-1, and S-4073-65-0 thru -75-0, incorporated herein by reference, mitigation measures and monitoring and reporting requirements have been made conditions of Project approval. The District concludes that the potential impact on air quality will be reduced to less than significant through compliance with District Rule 2201, (New Source Review), and implementation of required mitigation measures.

**Mitigation:**

Potentially Significant Impacts

Mitigation for this Project is required to reduce potentially significant impacts of a violation of the air quality standards and to prevent a cumulatively net increase of any criteria pollutants. Criteria Pollutants are air pollutants for which acceptable levels of exposure can be determined as set by federal or state ambient air quality standards. Examples of Criteria Pollutants include but are not limited to: Ozone, Carbon Monoxide, Lead, Oxides of Nitrogen (NOx), Sulfur Dioxide, and PM<sub>10</sub>. As a result of the Project, the Applicant must provide offsets to the District in order to mitigate potentially significant impacts of PM<sub>10</sub> and NOx emissions. Offsets are emission reductions recognized by the Air Pollution Control Officer in the form of Emission Reduction Credits that are issued in accordance with the provisions of District Rule 2301.

The following table summarizes offset requirements for NOx and PM<sub>10</sub> for the Project:

**Table 1 - Offset Requirements**

Pollutant	1 <sup>st</sup> Quarter	2 <sup>nd</sup> Quarter	3 <sup>rd</sup> Quarter	4 <sup>th</sup> Quarter
NOx	18,610	18,611	18,611	18,611
PM <sub>10</sub>	633	633	634	634

**NOx Emissions Reduction Credits**

The applicant has proposed to use the following NOx Emissions Reduction Credits, (ERCs), to offset NOx emissions increases. The quarterly amount for each certificate is as follows:

**Table 2 - Actual NOx Emissions Reduction Credits**

ERC #	Reduction Site	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr	4 <sup>th</sup> Qtr
N-715-2	Stockton	18,467	18,467	18,467	18,467
N-702-2	Lathrop	3,480	3,480	3,480	3,480
S-2730-2	Tupman	4,194	0	0	0
N-735-2	Stockton	0	1,824	1,822	1,823
N-733-2	Stockton	279	0	0	0

S-2808-2	Sec. 5, T30S, R21E	3,027	214	117	2,801
C-901-2	Fresno	0	0	0	212
S-2807-2	Mettler	0	0	0	256
S-2805-2	Sec. 26, T32S, R23E	0	3,045	460	364
S-2801-2	Sec. 7, T30S, R22E	0	0	3,511	0
S-2803-2	Sec. 16, T30S, R22E	0	2,417	1,590	2,044
Total ERCs Available:		29,448	29,449	29,450	29,451

Using the maximum offset ratio of 1.5, this facility may have to offset 27,917 lb-NOx/quarter ( $1.5 \times 18,611\text{lb-NOx/quarter}$ ). This offset amount is less than the total amount available in the proposed ERCs. Therefore, it is concluded that the proposed certificates are sufficient to offset the NOx emissions increases from this Project.

### **PM<sub>10</sub> Emissions Reduction Credits**

The applicant has proposed to use SOx ERCs to offset PM<sub>10</sub> emissions increases. The proposed ERCs are as follows:

**Table 3 - Actual SOx Emissions Reduction Credits**

ERC #	Reduction Site	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr	4 <sup>th</sup> Qtr
S-2752-5	Bakersfield Sec. NE6, 30S, R26E	1,500	1,500	1,500	1,500

Using the maximum offset ratio of 1.5 and the District approved PM<sub>10</sub>/SOx ratio of 1.06, this facility may have to offset 1,008 lb-SOx/quarter ( $1.06 \times 951\text{ lb-PM}_{10}\text{/quarter}$ ) to be equivalent to 951 lb-PM<sub>10</sub>/quarter ( $1.5 \times 634\text{ lb-PM}_{10}\text{/quarter}$ ). The offset amount available in each quarter of the proposed ERCs is greater than the 1,008 lb-SOx/quarter. Therefore, it is concluded that the proposed certificate is sufficient to offset the PM<sub>10</sub> emissions increases from the Project.

### **Sensitive Receptors (d)**

Per the District Policy Application Review (APR) 1905, for the Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed modification, the District perform an analysis to determine the possible impact to the nearest sensitive receptor, (off-site residents or worksites). Analysis may or may not include a Health Risk Assessment, (HRA), depending on the Project's prioritization score. An HRA is required for a Project only if the total facility prioritization score is greater than one (1). The risk management review (RMR) summary is as follows:

**Table 4 – Risk Assessment**

<b>RMR Summary</b>			
<b>Categories</b>	Steam generators (Unit 65-0 thru 75-0)	Project Totals	Facility Totals
<b>Prioritization Score</b>	<0.01	<0.01	0.36
Acute Hazard Index	NA	0.0	0.0
Chronic Hazard Index	NA	0.0	0.0
Maximum Individual Cancer Risk (10 <sup>-6</sup> )	NA	0.0	0.0
<i>T-BACT Required?</i>	<b>NO</b>		
<i>Special Permit Conditions?</i>	<b>NO</b>		

Nations Petroleum (California) LLC facility prioritization score is less than 1.0. Therefore, no further analysis is required to determine the impact from this Project and compliance with the District’s Risk Management Policy is expected.

Nuisance Odors (e)

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations provided the equipment is well maintained. Therefore, compliance with this rule is expected. The following condition will be placed on the permit:

- No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, ‘-7-1, ‘-9-1, ‘-11-2, ‘-42-1, ‘-65-0 thru ‘-75-0

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

**Discussion:** Nations Petroleum (California) LLC contracted with Quad-Knopf to perform an initial site survey of the property, which identified areas that may contain threatened and endangered species. Subsequent to this initial screening, Quad-Knopf developed a checklist to be used Nations Petroleum (California) LLC prior to any disturbance of potential habitat. Selected employees were provided training on conducting and documenting field surveys using this checklist. This training included the methodology for conducting the survey, i.e. physical inspection of the site on foot, physical identification of threatened and endangered species, and identification of tracks, scat, burrows, trails, etc. that might indicate the presence of these species.

In the event that the Nations Petroleum (California) LLC employee noted the potential presence of a threatened and endangered species, a certified biologist was contacted to conduct a more thorough review of the site. Nations Petroleum (California) LLC followed the recommendations of the certified biologist prior to conducting any site activity. Following this protocol assures that the Project results in a less than significant impact to threatened and endangered species. Therefore, the biology-related impacts are classified as no impact.

**Mitigation:** None required.

**Reference:** Nations Petroleum Biological Pre-Activity Surveys

<b>V. CULTURAL RESOURCES</b>  Would the Project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</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?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?				X
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
d) Disturb any human remains, including those interred outside of formal cemeteries?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and is compatible with existing and historic operational activities. Cultural resources are not known to exist on the project site. Therefore, the Project would not have an impact on environmental elements (a through d), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

<b>VI. GEOLOGY/SOILS</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</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:				X
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.				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?				X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility: Any structures resulting from this project shall be built according to Local, State, and Federal building standards. The construction and operation of the project is compatible with existing and historic operational activities and would not have an impact on geology and soils. Compliance with existing regulations is considered adequate to ensure that the proposed project would not increase the exposure of people or property to geologic hazards. Therefore, the Project would not have an impact on environmental elements (a through e), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

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

**Discussion:** The District performed a Risk Management Review (RMR) to determine the possible impact to the nearest resident or work site. The prioritization score is less than the District’s threshold value of 1.0., therefore no further analysis is required. The District has determined that the risk from the proposed Project to be less than significant. The Project would not have an impact on environmental elements (a through h), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

<b>VIII. HYDROLOGY / WATER QUALITY</b>  Would the Project:	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Violate any water quality standards or waste discharge requirements?				X
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net 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)?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?				X
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				X
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?				X
f) Otherwise substantially degrade water quality?				X
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
j) Inundation by seiche, tsunami, or mudflow				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and will not affect the drainage patterns, flood hazard exposure or alter storm drainage requirements. The subject projects are not subject to tsunami, seiches or mudflow. The Project can be accommodated under the existing land use entitlements. The site has no evidence of Hydrology/Water Quality significance. Therefore, the Project would not have an impact on environmental elements (a through j), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

IX. LAND USE / PLANNING  Would the Project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and can be accommodated under the existing land use entitlements. Thus, the Project would not have an impact on environmental elements (a through c), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

<b>MINERAL RESOURCES</b>				
<b>Would the Project:</b>	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and is compatible with existing and historic mineral resource related activities. Therefore, the Project would not have an impact on environmental elements (a through b), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

<b>XI. NOISE</b>				
<b>Would the Project:</b>	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				X
c) A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?				X
d) A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?				X
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?				X
f) For a Project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and can be accommodated under the existing land use entitlements. The Project site is remotely located and operation would be similar to existing and historic activities. Therefore, the Project would not have an impact on environmental elements (a through f), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

XII. POPULATION / HOUSING  Would the Project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
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)?				X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and can be accommodated under the existing land use entitlements. Therefore, the Project would not have an impact on environmental elements (a through c), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

<b>XIII. PUBLIC SERVICES</b>  <b>Would the Project:</b>	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				X
i) Fire protection?				X
ii) Police protection?				X
iii) Schools?				X
iv) Parks?				X
v) Other public facilities?				X
b) Cumulatively exceed official regional or local population Projections?				X
c) Induce substantial growth in an area either directly or indirectly (e.g., through Projects in an undeveloped area or extension of major infrastructure)?				X
d) Displace existing housing, especially affordable housing?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and can be accommodated under the existing land use entitlements. The project will not create any incremental demand for public services. Therefore, the Project would not have an impact on environmental elements (a through d), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, ‘-7-1, ‘-9-1, ‘-11-2, ‘-42-1, ‘-65-0 thru ‘-75-

<b>XIV. RECREATION</b>				
<b>Would the Project:</b>	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and can be accommodated under the existing land use entitlements. Operation would be similar to existing and historic activities. Therefore, the Project would not have an impact on environmental elements (a through b), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

<b>XV. TRANSPORTATION / TRAFFIC</b>				
<b>Would the Project:</b>	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?				X
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?				X
c) 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?				X

XV. TRANSPORTATION / TRAFFIC  Would the Project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e) Result in inadequate emergency access?				X
f) Result in inadequate parking capacity?				X
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and can be accommodated under the existing land use entitlements. Operation would be similar to existing and historic activities and the site has no evidence of Transportation/Traffic significance. Therefore, the Project would not have an impact on environmental elements (a through g), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

XVI. UTILITIES / SERVICE SYSTEMS  Would the Project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X

<b>XVI. UTILITIES / SERVICE SYSTEMS (Continued)</b>  <b>Would the Project:</b>	<b>Potentially Significant Impact</b>	<b>Potentially Significant Impact Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
d) Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?				X
e) Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?				X
f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?				X
g) Comply with federal, state, and local statutes and regulations related to solid waste?				X

**Discussion:** The Project is located within the perimeter of the existing Nations Petroleum (California) LLC facility and can be accommodated under the existing land use entitlements. Operation would be similar to existing and historic activities. Thus, the Project would not have an impact on environmental elements (a through g), as identified above.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0

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

**Discussion:** Review of this Project has not indicated any features that might significantly impact the environmental quality of the site and/or adjacent areas.

**Mitigation:** None required.

**Reference:** SJVUAPCD, *Authority to Construct Application Review*, Application Numbers S-4073-5-1, '-7-1, '-9-1, '-11-2, '-42-1, '-65-0 thru '-75-0