A. PROJECT BACKGROUND INFORMATION

1. Project Title:  Hanford L.P. Modification to Title V Permit

2. Lead Agency Name and Address

San Joaquin Valley Unified Air Pollution Control District
1990 E. Gettysburg Ave.
Fresno CA  93726

3. Contact Person:

CEQA: Hector R. Guerra
(559) 230-5800

Permit: Tim Bush
(559) 230-6000

4. Project Location:

10596 Idaho Avenue, Hanford, California 93230, approximately 4 miles south of the City of Hanford, Kings County, California (see location map on page 2 and site map on page 3)

Section 13 Township 19S Region 21E

5. Project Sponsor’s Name and Address:

San Joaquin Valley Unified Air Pollution Control District
1990 E. Gettysburg Ave.
Fresno CA  93726

6. Project Applicant:  Hanford L.P.
San Joaquin Valley Unified Air Pollution Control District Boundaries

Project is located in Kings County
7. Description of Project: Hanford L.P. has submitted an application for an Authority to Construct (ATC) equipment necessary to allow an existing coke-fired, 30 megawatt, power plant located in Kings County, California to burn higher sulfur content petroleum coke. This project is being undertaken to ensure supply of fuel for electricity generation when a source of low sulfur content petroleum coke fuel is not available or is not cost-effective. The ATC application requests an increase in the SO$_2$ emissions limit that will only apply when it is necessary to use high sulfur content petroleum coke because low sulfur content petroleum coke supply is neither available nor cost-effective. The high sulfur content petroleum coke will be transported to the site via haul trucks from Wilmington, CA. Transportation of high sulfur content petroleum coke will not result in an increase of vehicle exhaust emissions. In the event that higher sulfur
content petroleum coke is used, Hanford L.P. will be required to provide SO₂ emission offsets.

Hanford L.P. is proposing that the freeboard temperature of 1560 °F where the current SOₓ concentration is measured be changed to the bed temperature of 1500 °F. The reason for using the bed temperature is the limestone calcines at temperature greater than 1500 °F and sets off the reaction to control SOₓ. This revision has no impact on the emissions and reflects the actual operating conditions.

Hanford L.P. is also proposing startup and shutdown relief for NOₓ and SOₓ emissions. A start-up event commences when the petroleum coke feed to the CFBC is initiated and/or the feed board temperature is 1560 °F. The start-up event is complete when the NOₓ concentration and SOₓ concentration are in compliance with the concentration limits. A shutdown event commences when the petroleum coke feed to the CFBC is terminated and is complete when the combustion airflow to the CFBC is terminated. Hanford L.P. proposes that a start-up/shutdown event shall not exceed any of the following limits: 2 hours, 1 per day, 50 per year. The facility also proposes that the emissions during start-up/shutdown will not exceed 140 lb NOₓ/hr or 200 lb SO₂/hr. Current daily and annual emissions are proposed to remain at currently permitted levels when firing on the historically utilized lower sulfur Bakersfield coke.

Prior to utilizing high sulfur Wilmington petroleum coke, Hanford LP shall provide the District with a written request and analysis demonstrating that the historically utilized lower sulfur Bakersfield coke is not available. The request shall include the following:

- A demonstration that Bakersfield petroleum coke can not be continuously supplied under a long-term contract by the Flying J Bakersfield refinery (located at 6451 Rosedale HWY, and 3663 Gibson St, Bakersfield, CA) or,
- An analysis demonstrating that the Bakersfield lower sulfur coke is no longer economically feasible as a fuel source and is therefore unavailable.

Upon receipt of a written request and analysis, the District will analyze the request and approve or disapprove the use of the alternate Wilmington fuel.

- Current Permitted Emissions Limits (When fired on low sulfur type Bakersfield petroleum coke, NG, fuel oil or any combination of these fuels)
  - NO₂ or 245 lb/day
  - SO₂ or 244/day 3rd qtr, 245 lb/day every other quarter
  - O₂ or 244/day 3rd qtr, 245 lb/day every other quarter
  - PM₁₀
  - CO
  - VOC

- Proposed Emissions Limits (When fired on petroleum coke, NG, fuel oil or any combination of these fuels)
NO$_2$  28 ppmvd @ 3% O$_2$
 or 245 lb/day

SO$_2$  35 ppmvd @ 3% O$_2$
 or 469 lb/day

PM$_{10}$  80 lb/day

CO  544 lb/day

VOC  60 lb/day

Annual emissions
PE$\text{E}_2$  = 152,200 lb SO$_2$ /year (as proposed by applicant)

See Attachment A, Application for Authority to Construct for detailed emission calculations. Appendices are not included as part of Attachment A of this Initial Study/Negative Declaration. The Appendices are available upon request at the District’s Central Office

A:  Current PTO
B:  Fuel Test Report
C:  SO$_2$ Calculations
D:  ATC Application #9124
E:  Quarterly Net Emissions Change
F:  BACT Guideline
G:  BACT Analysis
H:  Offset Summary
I:  Ambient Air Analysis and HRA Summary
J:  Compliance Certification
K:  Draft ATC

8. Other Agencies Whose Approval Is Required and Permits Needed:

No other agencies have discretionary authority over this project.

9. Project Compatibility with Existing Zones and Plans:

Modification to Hanford L.P’s. Title V Permit will not affect any land use zones or plans.

10. Name of Person Who Prepared Initial Study:

Hector R. Guerra
Senior Air Quality Planner

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1 Post-project emission factor for SO$_X$ is based on preliminary test performed by the applicant.
B. **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.

<table>
<thead>
<tr>
<th>Land Use and Planning</th>
<th>Population and Housing</th>
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<tr>
<td>Geophysical</td>
<td>Water</td>
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<td>Air Quality</td>
<td>Transportation/Circulation</td>
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<td>Biological Resources</td>
<td>Energy and Mineral Resources</td>
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<td>Hazards</td>
<td>Noise</td>
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<td>Public Services</td>
<td>Utilities and Service Systems</td>
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<tr>
<td>Aesthetics</td>
<td>Cultural Resources</td>
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<tr>
<td>Recreation</td>
<td>Mandatory Findings of Significance</td>
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</table>
C.  **DETERMINATION**

I certify 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.

- **X** 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 on an attached sheet have been added to the project. A NEGATIVE DECLARATION will be prepared.

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

- I find that the proposed project **MAY** have a 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: Hector R. Guerra

Title: Senior Air Quality Planner
D. ENVIRONMENTAL IMPACT CHECKLIST

Explanations of all answers on the check off list are located in Section E.

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<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
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<td>Potentially Significant Impact Unless Mitigated</td>
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<td>Less Than Significant Impact</td>
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<td>No Impact</td>
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I. Geologic Problems: *Would the proposal result in or expose people to potential impacts involving:*

a) Fault rupture? 
   - X

b) Seismic ground shaking? 
   - X

c) Seismic ground failure, including liquefaction? 
   - X

d) Seiche, tsunami, or volcanic hazard? 
   - X

e) Landslides or mudflows? 
   - X

f) Erosion, changes in topography or unstable soil conditions from excavation, grading, or fill? 
   - X

g) Subsidence of the land? 
   - X

h) Expansive soils? 
   - X

i) Unique geologic or physical features? 
   - X

II. Air Quality. *Would the proposal:*

a) Violate any air quality standard or contribute to an existing or projected air quality violation? 
   - X

b) Expose sensitive receptors to pollutants? 
   - X

c) Alter air movement, moisture, or temperature, or cause any change in climate? 
   - X

d) Create objectionable odors? 
   - X

III. Water. *Would the proposal result in:*

a) Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff? 
   - X

b) Exposure of people or property to water related hazards such as flooding? 
   - X

c) Discharge into surface water or other alteration of surface water quality (e.g., temperature, dissolved oxygen or turbidity)? 
   - X

d) Changes in the amount of surface water in any water body? 
   - X

e) Changes in currents, or the course or direction of water movements? 
   - X

f) Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations, or through substantial loss of groundwater recharge capability? 
   - X
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<tr>
<th>g) Altered direction or rate of flow of ground waters?</th>
<th>Potentially Significant Impact</th>
<th>Potentially Significant Impact Unless Mitigated</th>
<th>Less Than Significant Impact</th>
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<td>h) Impacts to groundwater quality?</td>
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<tr>
<td>i) Substantial reduction in the amount of water otherwise available for public water supplies?</td>
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</table>

**IV. Biological Resources**

*Would the proposal result in impacts to:*

a) Endangered, threatened, or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)? **X**

b) Locally designated species (e.g., heritage trees)? **X**

c) Locally designated natural communities (e.g., oak forest, coastal habitat, etc.)? **X**

d) Wetland habitat (e.g., marsh, riparian, and vernal pool)? **X**

e) Wildlife dispersal or migration corridors? **X**

**V. Noise.**

*Would the proposal result in:*

a) Increases in existing noise levels? **X**

b) Exposure of people to severe noise levels? **X**

**VI. Land Use and Planning.**

*Would the proposal:*

a) Conflict with general plan designation or zoning? **X**

b) Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project? **X**

c) Be incompatible with existing land use in the vicinity? **X**

d) Affect agricultural resources or operations (e.g., impacts to soils or farmlands, or impacts from incompatible land uses)? **X**

e) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)? **X**

**VII. Energy and Mineral Resources.**

*Would the proposal:*

a) Conflict with adopted energy conservation plans? **X**

b) Use non-renewable resources in a wasteful and inefficient manner? **X**

c) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State? **X**
<table>
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<tr>
<th>VIII. Hazards</th>
<th>Would the proposal involve:</th>
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<tbody>
<tr>
<td>a) A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation)?</td>
<td>Potentially Significant Impact</td>
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<tr>
<td>b) Possible interference with an emergency response plan or an emergency evacuation plan?</td>
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<td>c) The creation of any health hazard or potential health hazard?</td>
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<tr>
<td>d) Exposure of people to existing sources of potential health hazards?</td>
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<tr>
<td>e) Increased fire hazard in areas with flammable brush, grass, or trees?</td>
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<tr>
<th>IX. Population and Housing</th>
<th>Would the proposal:</th>
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<tbody>
<tr>
<td>a) Cumulatively exceed official regional or local population projections?</td>
<td>Potentially Significant Impact</td>
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<tr>
<td>b) Induce substantial growth in an area either directly or indirectly (e.g. through projects in an undeveloped area or extension of major infrastructure)?</td>
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<tr>
<td>c) Displace existing housing, especially affordable housing?</td>
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<tr>
<th>X. Transportation/Circulation</th>
<th>Would the proposal result in:</th>
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<tbody>
<tr>
<td>a) Increased vehicle trips or traffic congestion?</td>
<td>Potentially Significant Impact</td>
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<tr>
<td>b) Hazards to safety from design features (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. , farm equipment)?</td>
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<td>c) Inadequate emergency access or access to nearby uses?</td>
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<td>d) Insufficient parking capacity on-site or off-site?</td>
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<td>e) Hazards or barriers for pedestrians or bicyclists?</td>
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<td>f) Conflicts with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?</td>
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<tr>
<td>g) Rail, waterborne or air traffic impacts?</td>
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<tr>
<th>XI. Public Services</th>
<th>Would the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:</th>
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<tbody>
<tr>
<td>a) Fire protection?</td>
<td>Potentially Significant Impact</td>
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<tr>
<td>b) Police protection?</td>
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<td>c) Schools?</td>
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<td></td>
<td>Potentially Significant Impact</td>
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<td>d) Parks or other recreational facilities?</td>
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<td>e) Maintenance of public facilities, including roads?</td>
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<tr>
<td>f) Other governmental services?</td>
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<tr>
<td>XII. Utilities and Service Systems. Would the proposal result in need for new systems or supplies or substantial alterations to the following utilities:</td>
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<tr>
<td>a) Power or natural gas?</td>
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<td>b) Communication systems?</td>
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<td>c) Local or regional water treatment or distribution facilities?</td>
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<td>d) Sewer or septic tanks?</td>
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<td>e) Storm water drainage?</td>
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<td>f) Solid waste and disposal?</td>
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<tr>
<td>g) Local or regional water supplies?</td>
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<td>XIII. Aesthetics. Would the proposal:</td>
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<td>a) Affect a scenic vista or scenic highway?</td>
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<td>b) Have a demonstrable negative aesthetic effect?</td>
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<td>c) Create light or glare?</td>
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<td>XIV. Recreation. Would the proposal:</td>
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<td>a) Increase the demand for neighborhood or regional parks or other recreational facilities?</td>
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<td>b) Affect existing recreational opportunities?</td>
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<td>XV. Cultural Resources. Would the proposal:</td>
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<td>a) Disturb paleontological resources?</td>
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<td>b) Disturb archaeological resources?</td>
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<td>c) Affect historical resources?</td>
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<td>d) Have the potential to cause a physical change which would affect unique cultural values?</td>
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<td>e) Restrict existing religious or sacred uses within the potential impact area?</td>
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</table>
XVI. Mandatory Findings of Significance

a) **Potential to degrade**: 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?

b) **Short-term**: Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one which occurs in a relatively, brief, definitive period of time. Long-term impacts will endure well into the future.)

c) **Cumulative**: Does the project have impacts which 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.)

d) **Substantial adverse**: Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

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E. ENVIRONMENTAL IMPACT CHECKLIST COMMENTS

I. Geologic Problems

The project site is in an area identified as CBC Seismic Zone 3. There is no change to the current facility associated with an increase of the SO$_2$ permit limits by changing from low sulfur content to high sulfur content petroleum coke.

II. Air Quality

Emissions of criteria pollutants other than SO$_2$ are not expected to change as a result of the project. Proposed SO$_2$ emissions increases have the potential to form secondary particulate matter in the atmosphere. The SJVAPCD continues to violate both State and Federal Standards for PM10 and PM2.5. Any increase in SO$_2$ emissions would potentially worsen an existing violation or have an adverse cumulative impact on these violations. In the event that higher sulfur content petroleum coke is used, Hanford L.P. will be required to provide SO$_2$ emission offsets. With this mitigation, project-specific and potential cumulative impacts from the proposed project will be insignificant. Also, the use of trucks to transport the higher sulfur content petroleum coke will not result in any significant impacts.

For additional detail regarding Hanford L.P. facility modification to Title VI Permit, see Attachment A, Application for Authority to Construct. Attachment A includes the facility processes, applicable District rules, compliance conditions, emission calculations, emissions offset conditions, daily emission limits and other detailed information. Appendices, listed below, are not included as part of Attachment A of this Initial Study/Negative Declaration; however, they are available upon request at the District’s Central Office

A: Current PTO
B: Fuel Test Report
C: SO$_2$ Calculations
D: ATC Application #9124
E: Quarterly Net Emissions Change
F: BACT Guideline
G: BACT Analysis
H: Offset Summary
I: Ambient Air Analysis and HRA Summary
J: Compliance Certification
K: Draft ATC

III. Water

There are no water quality or water use impacts associated with the proposed increase in SO$_2$ permit limits by changing from low sulfur content to high sulfur
content petroleum coke. There is no adverse impact to storm water that accumulates at the facility resulting from the change in permit conditions. There is no offsite discharge of storm water from this facility.

IV. Biological Impacts

There are no biological impacts associated with the proposed increase in SO\textsubscript{2} permit limits by changing from low sulfur content to high sulfur content petroleum coke.

V. Noise

There are no noise impacts associated with the proposed increase in SO\textsubscript{2} permit limits by changing from low sulfur content to high sulfur content petroleum coke.

VI. Land Use and Planning

The project site is zoned correctly, already in use as an existing industrial facility. The proposed project will not result in any alteration of the present or planned land use.

VII. Energy and Mineral Resources

There are no energy or mineral resources impacts associated with the proposed increase in SO\textsubscript{2} permit limits by changing from low sulfur content to high sulfur content petroleum coke.

VIII. Hazards

The operations of the facility will not change due to an increase in SO\textsubscript{2} permit limits by changing from low sulfur content to high sulfur content petroleum coke.

The facility has operating programs and procedures in place to prevent and mitigate potential health, safety and environmental risks.

The plant has full emergency response programs and capabilities. The programs and procedures that will be put in place for risk management and emergency response include: procedures for preventative maintenance and proper operations; systems to prevent the buildup of harmful gases; installation and maintenance of fire suppression and monitoring equipment; employee training in emergency response operations in cooperation with the City of Hanford Fire Department; worker safety programs and compliance with applicable Cal OSHA and other regulatory programs. All equipment included in the design and construction of the facility was selected to ensure safe operations.
The construction and operation of the plant has not created any additional or potential health hazard, nor will people be exposed to any additional potential health hazard resulting from the increase in the permit limits for SO$_2$ by changing from low sulfur content to high sulfur content petroleum coke. See attached health risk analysis.

IX. Population and Housing

There will be no impact on the human population of the area. There will be no impact to existing housing, nor will there be any demand for additional housing.

X. Transportation and Circulation

Current traffic to the existing facility is comprised of employee and service traffic combined with equipment and material deliveries. Present traffic is low on Idaho Avenue serving the current use and no impacts from the project are anticipated. The project will not result in an increase of any vehicle traffic as only the point of origin of the fuel supply may change.

XI. Public Services

There will be no effect on fire protection services provided by the City of Hanford Fire Department or the existing fire protection system. The project will not result in any increased demand for public services and will not have an impact on existing public services.

XII. Utilities and Service Systems

The proposed project will continue to provide its own electricity. As such it will not have any negative impact on electric power usage. As discussed in the storm water section (item III), the facility controls its storm water on-site and does not require services from the local flood control district.

XIII. Aesthetics

The existing facility is an already developed permitted use. The site is surrounded by industrial facilities and agricultural land. Accordingly, change of fuel type will not alter the character of the existing view of the public.
SO₂ is a colorless gas. The increase in SO₂ emissions would not have any effect on visible emissions by changing from low sulfur content to high sulfur content petroleum coke.

XIV. Recreation

The facility will not have any effect upon any existing recreational opportunities. The site is located on private property used exclusively for industrial purposes and does not offer any recreational opportunities.

XV. Cultural Resources

There are no archeological sites or cultural resources within the project area, and the development of the property would not adversely effect any known archeological sites or cultural resources.

The change in fuel type will occur in an area that has been developed and is already in industrial use. Accordingly, the facility will not affect any archeological site or result in adverse effects to any prehistoric or historic building. Moreover, the project will not affect any ethnic cultural values or restrict any existing religious or sacred uses within the area.

XVI. Mandatory Findings of Significance

a. The project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

b. The project does not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.

c. The project does not have impacts which are individually limited, but cumulatively considerable.

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

The proposed increase in the SO₂ emission limits will only occur when a low sulfur content petroleum coke source is not available or is not cost-effective. The proposed change will allow the existing Hanford L.P. power plant to continue to operate when low
sulfur content petroleum coke is unavailable from local sources. The potential increase in SO₂ will be mitigated by a permit condition requiring the increase to be offset with emission reduction credits. Based upon consideration of the information provided in the comments to the Environmental Checklist and other analyses performed for this project, it does not have the potential to degrade the quality of the environment or to interfere with either short-term or long-term environmental goals. The project is limited in scope to the modification of permits limits for an existing power generation facility. Accordingly, there will not be any significant cumulative impacts. Finally, the project will not cause any direct or indirect substantial adverse effects on human beings.