

State of California
Department of Housing and Community Development



**RECIRCULATED
DRAFT
ENVIRONMENTAL IMPACT REPORT**

**Adoption of Regulations Permitting Statewide Residential Use of
Chlorinated Polyvinyl Chloride (CPVC) Plastic Plumbing Pipe without
First Making a Finding of Potential Premature Metallic Pipe Failure
Due to Local Water or Soil Conditions**

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unforeseeable indirect consequences associated with removing the CPVC Findings Requirement.

To address these concerns, ROG emissions from CPVC usage were calculated with a safety factor (S.F.) of 2 for both design and worst-case analyses. A safety factor of 2 indicates that ROG emissions are 100% greater than what would be expected based on the assumptions listed above. In reality, since the assumptions used to estimate ROG emissions were conservative in the first place it is very unlikely that actual emissions would be 100% greater than initially estimated, however, out of an abundance of caution, the calculations were also completed with a S.F. of 2 for comparative purposes.

RESULTS

Assumptions and constants used to determine the increased ROG emissions associated with the project are listed in Table 4.2.4.2. The definitions and footnotes common to project analysis tables are listed in Table 4.2.4.3. Calculations based on the assumptions and methodology listed above are presented in Tables 4.2.4.4 through 4.2.4.11. Sample calculations for the determination of ROG emissions from Los Angeles County are presented as Table 4.2.4.16 as guide to interpreting and reproducing Tables 4.2.4.4 through 4.2.4.11. Note that slight differences between the calculations in various tables are expected due to rounding errors.

Comparisons of each county's estimated ROG emissions with the appropriate air district's most restrictive operational or construction threshold are presented in Table 4.2.4.12 and 4.2.4.13 for the annual and daily emission values, respectively. Comparisons of each air district's estimated ROG emissions summed across all counties in the district compared to the district's most restrictive operational or construction threshold are presented in Table 4.2.4.14 and 4.2.4.15 for the annual and daily emission values, respectively. Note that certain districts contain only portions of certain counties. For purposes of this analysis, it is assumed that each air district contains the entirety of each county that is located partially or wholly within the district, as a conservative measure.

SIGNIFICANCE DISCUSSION

Impact 4.2-1: The Project Could Increase ROG Emissions in Several Air Districts to a Level that Exceeds the ROG Significance Thresholds Established by Those Districts

Each California air district has established ROG significance thresholds. Those thresholds are based on either tons per year or pounds per day limits (see Table C-1). Those thresholds, along with the Project's contribution to ROG emissions in each air

district, are compared in Tables 4.2.4.14 and 4.2.4.15. Those tables show that the Project would generate ROG emissions exceeding the most restrictive significance thresholds in the following air districts:

- Bay Area Air Quality Management District;
- Feather River Air Quality Management District;
- Mojave Desert Air District;
- Sacramento Metropolitan Air Quality Management District;
- San Luis Obispo County Air Pollution Control District,
- San Joaquin Valley Air Pollution Control District; and
- South Coast Air Quality Management District.

Consequently, the Project would result in a significant increase in ROG emissions in each of the air districts listed above. The Lead Agency considers this to be a significant air quality impact.

Mitigation Measure 4.2-1: Require the Use of One-Step Cement (Without Primer)

The use of one-step cement would lower ROG emissions by 25% for single-family residential uses and by 21% for multi family residential. This mitigation measure would reduce ROG emissions to a less than significant level for the Feather River Air Quality Management District. However, despite the reduction, ROG emissions would still exceed the significance thresholds in the following air districts:

- Bay Area Air Quality Management District;
- Mojave Desert Air District;
- Sacramento Metropolitan Air Quality Management District;
- San Luis Obispo County Air Pollution Control District;
- San Joaquin Valley Air Pollution Control District; and
- South Coast Air Quality Management District.

Thus, even with implementation of this mitigation measure, ROG emissions would result in a significant and unavoidable air quality impact.

References

Air Resources Board, 2006. The California Almanac of Emissions and Air Quality, Sacramento, CA.

California Air Resources Board, accessed November 2, 2006
<http://www.arb.ca.gov/regact/area05/atta.pdf>

Federal Environmental Protection Agency website, March 2, 2006;
accessed November 2, 2006
<http://www.epa.gov/oar/oagps/greenbk/qncs.html#CALIFORNIA>