

Air Quality Technical Report for Burney Hat Creek Sawmill

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AIR QUALITY TECHNICAL REPORT

1.0 INTRODUCTION

This document presents the Air Quality Technical Report associated with the proposed Hat Creek Lumber, Inc (proposed project) in Shasta County, California. This document provides an overview of the existing air quality conditions at the project site, an analysis of potential air quality impacts that would result from implementation of the proposed project, and identification of applicable mitigation measures. A health risk assessment (HRA) was conducted to evaluate health impacts due to air toxics emissions from construction activities, steam kilns, and operational equipment such as loaders, grinder engine, sawmill engine, and forklifts. Issues related to odor and greenhouse gas (GHG) emissions are also addressed.

The supporting information, methodology, and assumptions used in the construction air emissions inventory and operational air emissions inventory are provided in:

- **Attachment A: Construction Air Emissions Inventory**
- **Attachment B: Operational Air Emissions Inventory**
- **Attachment C: Health Risk Assessment Methodology and Assumptions**

Air quality impacts were determined for United States Environmental Protection Agency (USEPA) criteria air pollutants such as carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter equal to or less than 10 micrometers (coarse particulate or PM₁₀), and particulate matter equal to or less than 2.5 micrometers (fine particulate or PM_{2.5}). When volatile organic compounds (VOC) such as reactive organic gases (ROG)¹ and nitrogen oxide (NO_x) accumulate in the atmosphere and are exposed to the ultraviolet component of sunlight, ozone (O₃) is formed. As such, the assessment of ozone was performed using emission estimates of ROG and NO_x, known as pollutant precursors.

2.0 PROJECT OVERVIEW

The proposed project is at 24339 State Route 89 near Burney in Shasta County. The proposed facility includes the addition of a sawmill and two steam kilns at an existing industrial site. Additional proposed project emission sources include construction activities, employee vehicle trips, haul truck trips, a natural gas boiler associated with the two steam kilns, grinder/planer, and operational equipment such as loaders and forklifts.

¹ VOC means any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions and thus, a precursor of ozone formation. ROG are any reactive compounds of carbon, excluding methane, CO, CO₂ carbonic acid, metallic carbides or carbonates, ammonium carbonate, and other exempt compounds. The terms VOC and ROG are often used interchangeably.

The proposed sawmill facility would be located on the Hat Creek Construction and Materials Eastside Aggregates site, which currently operates under Shasta County Use Permit UP 99-017 and Reclamation Plan 99-01 as a construction yard, rock quarry, rock crushing and screening plant, and asphalt batch plant. The proposed project would not result in any changes to existing operations of the Hat Creek Construction and Materials Eastside Aggregates site. A bioenergy facility has also been approved at the project site but has not yet been constructed. The primary source of electrical power for the sawmill would be Pacific Gas & Electric. Currently, there is no agreement between the bioenergy facility and the sawmill to provide electricity or steam.

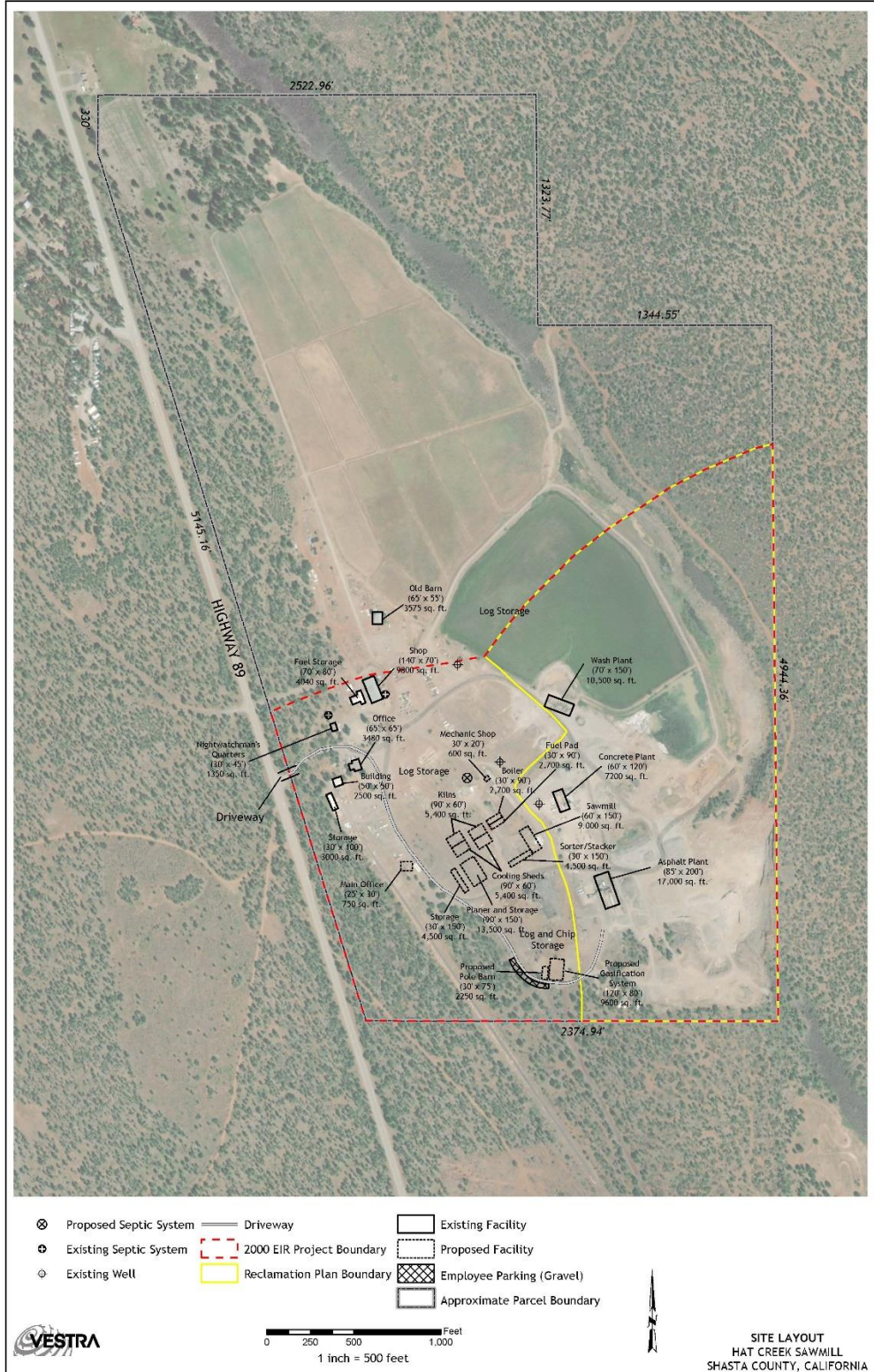
Based on the projected board feet production per year and assumed 240 working days, the proposed project will result in an average of 20 roundtrips per day for log delivery and lumber export. The proposed project will require an additional 30 employees, generating an additional 30 roundtrip employee commute trips each day.

The project includes construction of additional structures at the site including buildings for a log yard office, mechanic shop, planer, sawmill, cooling sheds, sorter stacker, and kilns. The buildings will be located north of the approved bioenergy facility location and west of the material-processing area for mining operations at the project site. Log scaling will occur near the existing main office at the project site. The log yard will be located north of the sawmill and log decks will be located throughout the project site. Equipment to be used at the operation will include log trucks, three loaders, conveyors and mill equipment, three forklifts, and water trucks for dust control.

The proposed sawmill facility would convert approximately 10 to 15 million board feet of logs (90,000 tons of logs per year and 375 tons of logs per day) into 18 to 25 million board feet of dimensional lumber on an annual basis. The sawmill is expected to operate for 240 days of the year (12 hours per day) while the two steam kilns and associated natural gas boiler are expected to operate 350 days per year (24 hours per day).

Figure 1: Project Site and Surrounding Area shows the project site and surrounding area. **Figure 2: Project Site Layout** shows the project site layout of the sawmill operation.

Figure 2. Project Site Layout



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The following onsite equipment is anticipated to be used for sawmill operations:

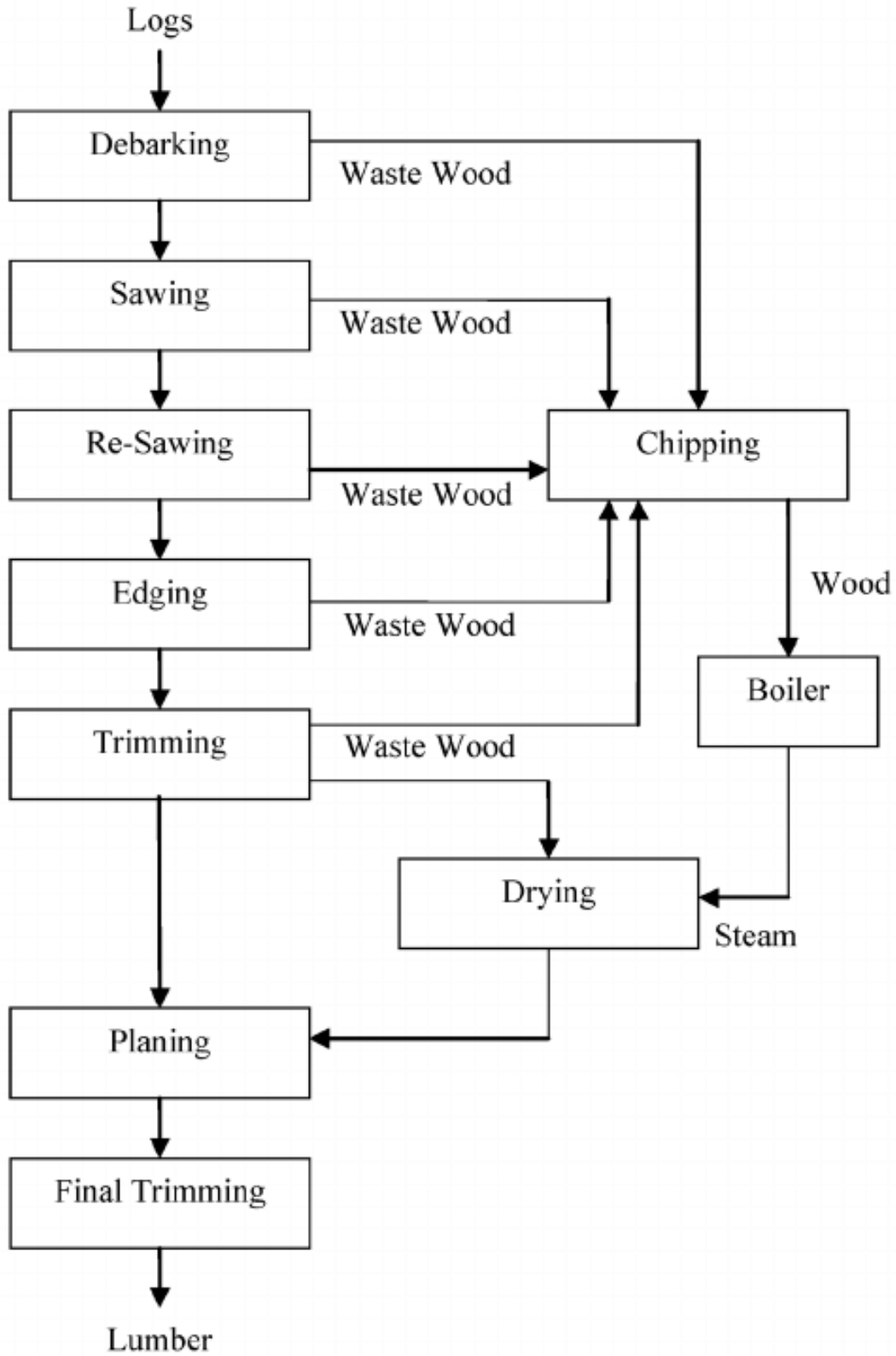
- One grinder/planer
- Three forklifts for loading and unloading boards from trucks and storage
- Two log loaders for sawlog handling
- One water truck to water work areas

The following is a description of the process steps within the sawmill operation:

- **Sawlog Unloading, Storage, and Conveyance:** This equipment is needed to accept woody biomass at the site. Sawlogs are only available six to eight months a year due to weather conditions that limit access to the forest (during the rainy season).
- **Debarking and Head-Sawing:** This equipment removes the bark and makes initial cuts on the sawlog to form what is known as a “cant” which are logs that are flat on at least one side. This process would create biomass waste that can be chipped and sent to the on-site bioenergy facility.
- **Resawing, Edging and Trimming:** Through this process, cants are shaped into a rough cut of their final lumber size. The resaw uses multiple bandsaws or gang saw blades to cut the log into merchantable logs. Edging and trimming would define the final cut size. This process would create biomass waste that can be chipped and sent to the on-site bioenergy facility.
- **Kiln Drying:** This equipment would facilitate the rapid drying and curing of the lumber and increase the value of the lumber. The two steam kilns would be rated to process 25,500,000 board feet per year (or 105,000 board feet per day). The kilns are supported by a natural gas steam boiler rated at 15,000 pounds per hour (or 25.5 million BTU per hour).
- **Final Trimming:** This process is the final step before the lumber is sent to market.

The sawmill operation would include a small sawmill and two kilns that would produce specialty softwood products. **Figure 3: Process Diagram** shows the general process for the sawmill.

Figure 3. Process Diagram



3.0 ANALYSIS METHODOLOGY

Intermittent, short-term construction emissions that occur from activities such as site-grading and construction are evaluated. Additionally, air emissions would occur during operation of the sawmill. This air quality analysis is consistent with the methods described in the Shasta County Air Quality Management District (SCAQMD) *Protocol for Review, Land Use Permitting Activities, Procedures for Implementing the California Environmental Quality Act*² and *Environmental Review Guidelines, Procedures for Implementing the California Environmental Quality Act*.³ Regulatory models used to estimate air quality impacts include:

- California Air Pollution Officers Association (CAPCOA) CalEEMod (California Emissions Estimator Model Version 2020.4.0)⁴ land use emissions model estimates emissions due to demolition and construction activities and operations for land use development.
- California Air Resources Board's (CARB) EMFAC2021⁵ emissions inventory model. EMFAC2021 is the latest emission inventory model that calculates emission inventories and emission rates for motor vehicles operating on roads in California. This model reflects CARB's current understanding of how vehicles travel and how much they emit. EMFAC can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future.
- CARB OFFROAD2021⁶ emissions inventory model. OFFROAD is the latest emission inventory model that calculates emission inventories and emission rates for off-road equipment such as loaders, excavators, and off-road haul trucks operating in California. This model reflects CARB's current understanding of how equipment operates and how much it emits. OFFROAD can be used to show how California off-road equipment emissions have changed over time and are projected to change in the future.
- USEPA AP-42, *Compilation of Air Pollutant Emission Factors*, has been published since 1972 as the primary compilation of USEPA's emission factor information. It contains emission factors and process information for more than 200 air pollution source categories. A source category is a specific industry

² Shasta County Air Quality Management District, *Protocol for Review, Land Use Permitting Activities, Procedures for Implementing the California Environmental Quality Act*, November 2003,

https://www.shastacounty.gov/sites/default/files/fileattachments/air_quality/page/2415/scaqmd-ceqa-land-use-protocol.pdf

³ Shasta County Air Quality Management District, *Environmental Review Guidelines, Procedures for Implementing the California Environmental Quality Act*, November 2003,

https://www.shastacounty.gov/sites/default/files/fileattachments/air_quality/page/2415/scaqmd-ceqa-guidelines.pdf

⁴ California Air Pollution Officers Association, *California Emissions Estimator Model User's Guide*, May 2021, <http://www.caleemod.com/>

⁵ California Air Resources Board, EMFAC2021 User's Guide, January 15, 2021, https://ww2.arb.ca.gov/sites/default/files/2021-01/EMFAC202x_Users_Guide_01112021_final.pdf

⁶ California Air Resources Board, OFFROAD2021, <https://ww2.arb.ca.gov/sites/default/files/offroadzone/offroadzone.html>

sector or group of similar emitting sources. The emission factors have been developed and compiled from source test data, material balance studies, and engineering estimates.⁷

- USEPA Region 10 HAP and VOC Emission Factors for Lumber Drying.⁸ A list of volatile organic compound and hazardous air pollutant emission factors in units of pounds of pollutant per thousand board feet of lumber dried for estimating emissions from lumber drying kilns.
- USEPA Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country.⁹ USEPA Region 10 has compiled particulate matter emission factors for use in determining the emissions for activities at sawmills, excluding boilers.
- USEPA, Emission Factors for Greenhouse Gas Inventories.¹⁰ A list of GHG emission factors for a variety of fuel types.

4.0 EXISTING CONDITIONS

The proposed project is located approximately 40 miles to the northeast of the City of Redding, which is in Shasta County at the northern end of the Northern Sacramento Valley Air Basin (NSVAB). The NSVAB consists of a total of seven counties: Sutter, Yuba, Colusa, Butte, Glenn, Tehama, and Shasta. The NSVAB is bounded on the north and west by the Coastal Mountain Range and on the east by the southern portion of the Cascade Mountain Range and the northern portion of the Sierra Nevada range. These mountain ranges reach heights more than 6,000 feet above mean sea level, with individual peaks rising much higher. The mountains form a substantial physical barrier to locally created pollution as well as pollution transported northward on prevailing winds from the Sacramento metropolitan area.

The environmental conditions of Shasta County are conducive to potentially adverse air quality conditions. The basin area traps pollutants between two mountain ranges to the east and the west. This problem is exacerbated by a temperature inversion layer that traps air at lower levels below an overlying layer of warmer air. Prevailing winds in the area are from the south and southwest. Sea breezes flow over the San Francisco Bay Area and into the Sacramento Valley, transporting pollutants from the large urban areas. Growth and urbanization in Shasta County have also contributed to an increase in emissions.

⁷ United States Environmental Protection Agency, AP 42, Compilation of Air Pollutant Emission Factors, Fifth Edition, Volume I, <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors>

⁸ United States Environmental Protection Agency, Region 10 HAP and VOC Emission Factors for Lumber Drying, January 2021, <https://www.epa.gov/system/files/documents/2021-07/epa-region-10-lumber-drying-ef-january-2021.pdf>

⁹ United States Environmental Protection Agency, Technical Memoranda for Sawmills, Region 10, <https://www.epa.gov/caa-permitting/technical-memoranda-sawmills-region-10>

¹⁰ United States Environmental Protection Agency, Emission Factors for Greenhouse Gas Inventories, March 9, 2018, https://www.epa.gov/sites/default/files/2018-03/documents/emission-factors_mar_2018_0.pdf

Regional Meteorology

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

The climate in the vicinity of the project site provides average maximum and minimum winter (i.e., January) temperatures of 44 degrees Fahrenheit (°F) and 19 °F, respectively, while average summer (i.e., July) maximum and minimum temperatures are 88 °F and 44 °F, respectively. Rainfall averages approximately 67 inches per year and snowfall averages 79 inches per year, with an average winter snow depth of two inches. Average annual wind speeds are approximately 19 miles per hour (mph), with average monthly peak wind speed at approximately 29 mph during October, and average monthly minimum average wind speed at 11 mph in June.¹¹

Nearby Sensitive Receptors

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

Residential areas are considered more sensitive to air quality conditions than commercial and industrial areas, because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational uses are also considered sensitive, due to the greater exposure to ambient air quality conditions and because the presence of pollution detracts from the recreational experience. Burney Fall Resort RV Park is located beyond 3,000 feet to the northwest of the kilns. No schools, daycare facilities, or residential units are within ¼ mile from the project site. Even though, the nearest receptors are more than 3,000 feet from the project site, a health risk assessment was completed (see **Section 10**).

¹¹ Western Regional Climate Center, Burney, California, Period of Record Monthly Climate Summary: July 1, 1948 to September 17, 2015, <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca1214>

Local Air Quality

Ambient air quality in Shasta County, and thus at the project site, can be inferred from ambient air quality measurements conducted at air quality monitoring stations. Existing levels of ambient air quality and historical trends and projections in the region are documented by measurements made by the SCAQMD, which is the air pollution regulatory agency for the portion of the NSVAB in Shasta County. These measurements are affected by pollutants generated by the urbanized land uses in Shasta County as well as by land uses in the entire NSVAB and beyond.

CARB maintains a network of monitoring stations within the NSVAB that monitor air quality and compliance with applicable ambient standards. The monitoring station closest to the project site is located in Shasta Lake. Ozone, PM₁₀, and PM_{2.5} are the primary pollutants affecting the NSVAB. **Table 1: Air Quality Data Summary (2019 – 2021)** summarizes the most recent three years of data (2019 through 2021) from the air monitoring station. Ozone data is measured at 13791 Lake Boulevard in Shasta Lake, 2220 North Street in Anderson, and at the Health Department in Redding. PM₁₀ is measured at 4066 La Mesa Avenue in Shasta Lake, North Street in Anderson, and at the Health Department in Redding. PM_{2.5} is measured at the Health Department in Redding.

Table 1
Air Quality Data Summary (2019 - 2021)

Pollutant	Monitoring Data by Year			
	Standard ^f	2019	2020	2021
Ozone				
Highest 1 Hour Average (ppm)	0.09	0.073	0.088	0.078
Highest 8 Hour Average (ppm)	0.070	0.070	0.078	0.073
Particulate Matter (PM10)				
Highest 24-Hour Average (mg/m ³)	50	42.3	108	122
State Annual Average (mg/m ³)	20	14.6	23.6	21.0
Particulate Matter (PM2.5)				
Highest 24-Hour Average (mg/m ³)	35	24.1	68.3	165
State Annual Average (mg/m ³)	12	6.7	10.2	11.8

Notes: Values in **bold** are in excess of at least one applicable standard.

Generally, State and national standards are not to be exceeded more than once per year.

ppm = parts per million; mg/m³ = micrograms per cubic meter.

PM₁₀ is not measured every day of the year. Number of estimated days over the standard is based on 365 days per year.

Source: California Air Resources Board, Air Quality Data Statistics, <https://www.arb.ca.gov/adam/index.html>

The State one-hour ozone standard as well as State and National eight-hour ozone standards were exceeded in 2020 and 2021. The State 24-hour PM₁₀ standard was exceeded in 2020 and 2021 and the

State annual PM₁₀ standard was exceeded in 2020 and 2021. The National 24-hour PM_{2.5} standard was exceeded in 2020 and 2021. PM₁₀ and PM_{2.5} concentrations in 2020 and 2021 may have been adversely affected by wildfires.

5.0 REGULATORY CONTEXT

USEPA has established the National Ambient Air Quality Standards (NAAQS) under the federal Clean Air Act (CAA) for six common air pollutants known as “criteria air pollutants.”¹² These air pollutants consist of CO, NO₂, ozone (O₃), particulate matter (PM₁₀ and PM_{2.5}), SO₂, and lead (Pb). An ambient air quality standard establishes the concentration above which the pollutant is known to cause adverse health effects to sensitive groups within the population such as children and the elderly. Ambient air quality standards are classified as either “primary” or “secondary” standards. Primary standards define levels of air quality, including an adequate margin of safety, necessary to protect public health. Secondary ambient air quality standards define levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant. The ambient air quality standards are shown in **Table 2: State and National Criteria Air Pollutant Standards, Effects, and Sources**.

Under the federal CAA, USEPA designates air basins where NAAQS are exceeded as “non-attainment” areas. If standards are met, the area is designated as an “attainment” area. If there are inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.” Areas where air pollution levels persistently exceed the State or national ambient air quality standards are designated “non-attainment.” Federal non-attainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards.

¹²United States Environmental Protection Agency, Six Common Air Pollutants, <https://www.epa.gov/criteria-air-pollutants>

Table 2
State and National Criteria Air Pollutant Standards, Effects, and Sources

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone	1 Hour 8 Hour	0.09 ppm 0.07 ppm	– 0.070 ppm	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when reactive organic gases and nitrogen oxides react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial / industrial mobile equipment.
Carbon Monoxide (CO)	1 Hour 8 Hour	20 ppm 9.0 ppm	35 ppm 9.0 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
Nitrogen Dioxide (NO ₂)	1 Hour Annual	0.18 ppm 0.03 ppm	0.10 ppm 0.053 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
Sulfur Dioxide (SO ₂)	1 Hour 3 Hour 24 Hour Annual	0.25 ppm – 0.04 ppm –	0.075 ppm 0.5 ppm 0.14 ppm 0.030 ppm	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
Coarse Particulate Matter (PM ₁₀)	24 Hour Annual	50 µg/m ³ 20 µg/m ³	150 µg/m ³ –	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
Fine Particulate Matter (PM _{2.5})	24 Hour Annual	– 12 µg/m ³	35.0 µg/m ³ 12.0 µg/m ³	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including nitrogen oxides, sulfur oxides, and organics.
Lead (Pb)	Month Rolling 3 Month	1.5 µg/m ³ –	– 0.15 µg/m ³	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction.	Present sources: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.

Source: Air Quality Standards, <https://ww2.arb.ca.gov/resources/background-air-quality-standards>

In 1994, the air districts in the Northern Sacramento Valley Planning Area (NSVPA), which includes the SCAQMD jurisdiction, prepared an Air Quality Attainment Plan for ozone. This plan was updated in 1997, 2000, 2003, 2006, 2009, 2012, 2015 and again in 2018. Like the preceding plans, the 2018 plan focuses on the adoption and implementation of control measures for stationary sources, area-wide sources, indirect sources, and public information and education programs. The 2018 plan also addresses the effect that pollutant transport has on the NSVPA's ability to meet and attain the state standards. The Air Quality Attainment Plan provides local guidance for air basins to achieve attainment of ambient air quality standards. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as non-attainment areas. Areas for which there is insufficient data available are designated unclassified. The region is in non-attainment for the state ozone standard.

CARB manages air quality, regulates mobile emissions sources, and oversees the activities of county and regional Air Pollution Control Districts and Air Quality Management Districts. CARB regulates local air quality indirectly by establishing State ambient air quality standards and vehicle emissions and fuel standards; and by conducting research, planning and coordinating activities. California has adopted ambient standards (known as California Ambient Air Quality Standards or CAAQS) that are more stringent than the federal standards for some criteria air pollutants. Under the California CAA patterned after the federal CAA, areas have been designated as attainment or non-attainment with respect to the State standards.

Shasta County Air Quality Management District

The SCAQMD is designated by law to adopt and enforce regulations to achieve and maintain ambient air quality standards. The SCAQMD, along with other air districts in the NSVAB, has committed to jointly prepare the NSVAB Air Quality Attainment Plan for the purpose of achieving and maintaining healthful air quality throughout the air basin. In addition, the SCAQMD adopts and enforces controls on stationary sources of air pollutants through its permit and inspection programs, and it regulates agricultural burning. Other responsibilities include monitoring air quality, preparing clean air plans, and responding to citizen complaints concerning air quality. All projects in Shasta County are subject to applicable SCAQMD rules and regulations in effect at the time of construction. Descriptions of specific rules applicable to future construction resulting from implementation of the proposed project may include, but are not limited to:

- SCAQMD Rule 2:1A, Authorities to Construct/Permits to Operate, allows any person to use construction equipment for construction activities, and must obtain a permit to operate prior to installation activities. The purpose of this Rule is to establish pre-construction review requirements for new and modified stationary sources of air pollution for use of Best Available

Control Technology (BACT), analysis of air quality impacts, and to ensure that the operation of such sources does not interfere with the attainment or maintenance of ambient air quality standards. This Rule shall apply to all new and modified stationary sources that are subject to District permit requirements, and after construction, emit or may emit any affected pollutants. An application would need to be submitted along with all pertinent information before a complete evaluation can be completed for this project.

- SCAQMD Rule 2:2, Emissions Reduction Credit and Banking Rule, provides for a mechanism for permitted and non-permitted emissions sources to deposit, transfer, and use emission reduction credits (ERC) as offsets as allowed by applicable laws and regulations. The provisions of Rule 2:2 apply to the deposit, transfer, and use of ERC from stationary sources and open biomass burning sources of air pollution emissions. ERC are typically required when stationary source pollutants exceed 25 tons per year.
- SCAQMD Rule 3:2, Specific Air Contaminants, controls the amount of air contaminants allowed to be discharged into the atmosphere.
- SCAQMD Rule 3:15, Cutback and Emulsified Asphalt, requires cutback and emulsified asphalt application to be conducted in accordance with Rule 3:15.
- SCAQMD Rule 3:16, Fugitive, Indirect, or Non-Traditional Sources, controls the emission of fugitive dust during earth-moving, construction, demolition, bulk storage, and conditions resulting in wind erosion.
- SCAQMD Rule 3:28, Stationary Internal Combustion Engines, limits the emissions of NO_x and CO from stationary internal combustion engines. The emissions limits identified by this rule are not applicable to emergency standby engines; however, the rule does require that testing and maintenance for emergency generators be limited to no more than 100 hours per year.
- SCAQMD Rule 3:31, Architectural Coatings, controls the architectural coatings and solvents used at the project site.
- SCAQMD Rule 3:32, Adhesives and Sealants, limits the emissions of VOC from adhesives and sealants and associated primers, and from related surface preparation solvents, cleanup solvents, and strippers.

Shasta County General Plan

The Shasta County General Plan, as amended through September 2004, provides the following air quality objectives and policies relative to the proposed project:

AQ-1. To protect and improve the County's air quality in accordance with Federal and State clean air laws in order to: (1) safeguard human health, and (2) minimize crop, plant, and property damage.

AQ-2c. Land use decisions, where feasible, should contribute to the improvement of air quality. New projects shall be required to reduce their respective air quality impacts to below levels of significance or proceed as indicated in Policy AQ-2e.

AQ-2d. Shasta County shall ensure that air quality impacts identified during CEQA review are: (1) consistently and fairly mitigated, and (2) mitigation measures are feasible.

AQ-2e. Shasta County will cooperate with the AQMD in assuring that new projects with stationary sources of emissions of non-attainment pollutants or their precursors that exceed 25 tons per year shall provide appropriate emission offsets. A comparable program which offsets indirect emissions of these pollutants exceeding 25 tons per year from development projects shall also be utilized to mitigate air pollution impacts. An Environmental Impact Report will be required for all projects that have unmitigated emissions of non-attainment pollutants exceeding 25 tons per year.

AQ-2f. Shasta County shall require appropriate Standard Mitigation Measures and Best Available Mitigation Measures on all discretionary land use applications as recommended by the AQMD in order to mitigate both direct and indirect emissions of non-attainment pollutants.

AQ-2g. Significance thresholds as proposed by the AQMD for emissions shall be utilized when appropriate for: (1) ROG and NO_x, both of which are precursors of ozone, and (2) PM₁₀ in determining mitigation of air quality impacts.

Criteria Air Pollutants

The following provides a summary of the potential health and welfare effects and typical sources of each of the criteria air pollutants and air toxics.

Ozone

Ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and that can cause substantial damage to vegetation and other materials. O₃ is not emitted directly into the atmosphere but is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving VOC and NO_x. VOC and NO_x are known as precursor compounds for O₃. Substantial ozone production generally requires O₃ precursors to be present in a stable atmosphere with strong sunlight for approximately three hours. O₃ is a regional air pollutant because it is not emitted directly by sources but is formed downwind of sources of VOC and NO_x under the influence of wind and sunlight. O₃ concentrations tend to be higher in the late spring, summer, and fall, when long sunny days combine with regional air subsidence inversions to create conditions conducive to the formation and accumulation of secondary photochemical compounds.

Ozone can also be transported long distances by wind. For this reason, even rural areas can experience high ozone levels. In the NSVPA, ozone is a seasonal problem typically occurring during the months of May through October. Sources of NO_x and ROG emissions include motor vehicles, power plants, factories, chemical solvents, combustion products from various fuels, and consumer products.

The NSVPA experiences transport ozone from the Sacramento Area. Emissions that were originally created in the Broader Sacramento Area can be transported northward via prevailing winds to affect the pollution levels of the NSVPA. On most summer days, the so-called “delta breeze” blows from the Carquinez Strait northeast towards Sacramento. Reaching Sacramento, the delta breeze turns northward and continues into the northern Sacramento Valley and the foothills of the northern Sierra Nevada. It is possible under the right conditions that Bay Area emissions could also be carried to the Northern Sacramento Valley and to the foothills of the northern Sierra Nevada. The impacts of transported Broader Sacramento Area air pollution to districts in the Upper Sacramento Valley are variable.

Transport from the Sacramento Area dominates the air quality in the Upper Sacramento Valley, as far north as Butte and Tehama counties. However, violations in Shasta County, at the northern end of the Sacramento Valley, are occasionally entirely due to local emissions, sometimes entirely due to transport, and sometimes a mixture of both.

Carbon Monoxide

CO is a nonreactive pollutant that is a product of incomplete combustion of organic material, and is mostly associated with motor vehicle traffic, and in wintertime, with wood-burning stoves and fireplaces. High CO concentrations develop primarily during winter when periods of light winds combine with the formation of ground-level temperature inversions (typically from the evening through early morning).

These conditions result in reduced dispersion of vehicle emissions. Motor vehicles also exhibit increased CO emission rates at low air temperatures.

When inhaled at high concentrations, CO combines with hemoglobin in the blood and reduces its oxygen-carrying capacity, resulting in reduced levels of oxygen reaching the brain, heart, and other body tissues. This condition is especially critical for people with cardiovascular diseases, chronic lung disease, or anemia. CO measurements and modeling were important in the early 1980s when CO levels were regularly exceeded throughout California, but in more recent years, CO measurements and modeling are not a priority in most California air districts due to the retirement of older vehicles, fewer emissions from new vehicles, and improvements to fuels.

Nitrogen Oxides

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

Volatile Organic Compounds

VOC means any compound of carbon, excluding carbon monoxide, carbon dioxide (CO₂), carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions and thus, a precursor of ozone formation. VOC are any reactive compounds of carbon, excluding methane, CO, CO₂, carbonic acid, metallic carbides or carbonates, ammonium carbonate, and other exempt compounds.

VOC include a variety of chemicals, some of which may have short- and long-term adverse health effects. VOC are emitted by a wide array of products numbering in the thousands. Examples include paints and lacquers, paint strippers, cleaning supplies, building materials and furnishings, as well as fuel storage and use.

VOC can cause eye, nose, and throat irritation; headaches, loss of coordination, nausea; and damage to the liver, kidney, and central nervous system. Some organics can cause cancer in animals; some are suspected or known to cause cancer in humans. The ability of organic chemicals to cause health effects varies greatly from those that are highly toxic, to those with no known health effect. As with other pollutants, the extent and nature of the health effect would depend on many factors including level of exposure and length of time exposed. Eye and respiratory tract irritation, headaches, dizziness, visual

disorders, and memory impairment are among the immediate symptoms that some people have experienced soon after exposure to some organics.

Particulate Matter

PM₁₀ and PM_{2.5} consist of airborne particles that measure 10 micrometers or less in diameter and 2.5 micrometers or less in diameter, respectively. PM₁₀ and PM_{2.5} represent fractions of particulate matter that can be inhaled into the air passages and the lungs, causing adverse health effects. Particulate matter in the atmosphere results from many kinds of dust- and fume-producing industrial and agricultural operations, fuel combustion, wood burning stoves and fireplaces, and atmospheric photochemical reactions. Some sources of particulate matter, such as demolition, construction activities and mining, are more local in nature, while others such as vehicular traffic and wood burning stoves and fireplaces, have a more regional effect.

Very small particles of certain substances (e.g., sulfates and nitrates) can cause lung damage directly, or can contain adsorbed gases (e.g., chlorides or ammonium) that may be injurious to health. Particulates can also damage materials and reduce visibility. Dust comprised of large particles (diameter greater than 10 micrometers) settles out rapidly and is easily filtered by human breathing passages. This dust is of concern more as a soiling nuisance rather than a health hazard. The remaining fractions, PM₁₀ and PM_{2.5}, are a health concern particularly at levels above the federal and California ambient air quality standards. PM_{2.5} (including diesel exhaust particles) is thought to have greater effects on health, because these particles are so small and thus penetrate to the deepest parts of the lungs.

Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, coughing, bronchitis, and respiratory illnesses in children. Mortality studies since the 1990s have shown a statistically significant direct association between mortality (premature deaths) and daily concentrations of particulate matter in the air. Despite important gaps in scientific knowledge and continued reasons for some skepticism, a comprehensive evaluation of the research findings provides persuasive evidence that exposure to fine particulate air pollution has adverse effects on cardiopulmonary health. The CARB has estimated that achieving the ambient air quality standards for PM₁₀ could reduce premature mortality rates by 6,500 cases per year.

Sulfur Dioxide

SO₂ is a combustion product of sulfur or sulfur-containing fuels such as coal and diesel. SO₂ is also a precursor to the formation of atmospheric sulfate and particulate matter and contributes to potential atmospheric sulfuric acid formation that could precipitate downwind as acid rain.

Lead

Ambient lead concentrations meet both the federal and State standards in the Project area. Lead has a range of adverse neurotoxin health effects and was released into the atmosphere via leaded gasoline products. The phase-out of leaded gasoline in California has resulted in dramatically decreased levels of atmospheric lead. Metal processing is currently the primary source of lead emissions in the SCAB. The highest concentrations of lead in air are generally found near lead smelters and general aviation airports, where piston aircraft use leaded fuel. Other stationary sources that generate lead emissions include waste incinerators, utilities, and lead-acid battery manufacturers. The maximum lead concentrations recorded in the Project area are below federal and California standards. Notably, diesel fuel does not contain lead emissions and gasoline fuel is unleaded.

Toxic Air Contaminants

Non-criteria air pollutants or toxic air contaminants are airborne substances that can cause short-term (acute) and/or long-term (chronic or carcinogenic, i.e., cancer causing) adverse human health effects (i.e., injury or illness). TAC includes both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TAC includes approximately 240 compounds, including particulate emissions from diesel-fueled engines and asbestos.

In August of 1998, CARB identified particulate emissions from diesel-fueled engines as TAC. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*¹³ and *Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*.¹⁴ The document represents a proposal to reduce diesel particulate emissions, with the goal to reduce emissions and the associated health risk by 75 percent in 2010 and 85 percent in 2020. The program aims to require the use of state-of-the-art catalyzed diesel particulate filters and ultra-low sulfur diesel fuel on diesel-fueled engines.

DPM is the most complex of diesel emissions. Diesel particulates, as defined by most emission standards, are sampled from diluted and cooled exhaust gases. This definition includes both solid and liquid material that condenses during the dilution process. The basic fractions of DPM are elemental carbon; heavy hydrocarbons derived from the fuel and lubricating oil and hydrated sulfuric acid derived from the fuel

¹³ California Air Resources Board, Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles, October 2000, [Report: 2000-10-00 Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles \(ca.gov\)](https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/rmgfinal.pdf)

¹⁴ California Air Resources Board, Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines, October 2000, <https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/rmgfinal.pdf>

sulfur. DPM contains a large portion of the polycyclic aromatic hydrocarbons (PAH) found in diesel exhaust. Diesel particulates include small nuclei particles of diameters below 0.04 micrometers (μm) and their agglomerates of diameters up to 1 μm . DPM is a major factor in total TAC exposure in California.

California State law defines TAC as air pollutants having carcinogenic effects. A total of 243 substances have been designated as TAC under California law; they include the 187 (federal) hazardous air pollutants (HAP) adopted in accordance with AB 2728. The Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) seeks to identify and evaluate risk from air toxics sources, but AB 2588 does not regulate air toxics emissions. TAC emissions from individual facilities are quantified and prioritized. Depending on the risk levels, emitting facilities are required to implement varying levels of risk reduction measures.

6.0 THRESHOLDS OF SIGNIFICANCE

The significance of potential impacts was determined based on State CEQA Guidelines, Appendix G, and the SCAQMD’s *Protocol for Review, Land Use Permitting Activities, Procedures for Implementing the California Environmental Quality Act*.¹⁵ Using Appendix G evaluation thresholds, the proposed project would be considered to have significant air quality impacts if it were to:

- A. Conflict with or obstruct implementation of the applicable air quality plan;
- B. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
- C. Expose sensitive receptors to substantial pollutant concentrations; or
- D. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The thresholds of significance applied to assess project-level air quality impacts are:

- Daily emissions of 25 pounds per day of ROG and NO_x and 80 pounds per day of PM_{10} (Level A)
- Daily emissions of greater than 137 pounds per day of ROG, NO_x , and PM_{10} (Level B)
- Exposure of persons by siting a new source or a new sensitive receptor to substantial levels of TAC resulting in (a) a cancer risk level greater than 10 in one million and (b) a noncancerous risk

¹⁵ Shasta County Air Quality Management District, *Protocol for Review, Land Use Permitting Activities, Procedures for Implementing the California Environmental Quality Act*, November 2003, https://www.shastacounty.gov/sites/default/files/fileattachments/air_quality/page/2415/scaqmd-ceqa-land-use-protocol.pdf

(chronic or acute) hazard index greater than 1.0. For this threshold, sensitive receptors include residential uses, schools, parks, daycare centers, nursing homes, medical centers, and offsite workers

- Frequently and for a substantial duration, create or expose sensitive receptors to substantial objectionable odors affecting a substantial number of people

These thresholds are consistent with New Source Review Rule 2:1 adopted by the SCAQMD Board in 1993 as required by the California CAA. If the project's indirect and area wide emissions are greater than the Level A thresholds but less than Level B thresholds, appropriate Level A mitigation is required to be implemented by the project applicant. If the project's indirect and area wide emissions are above the Level B threshold of 137 pounds per day after applying all feasible mitigation measures, the project would be considered to have a significant impact from an air quality perspective.

The SCAQMD and the Shasta County General Plan recommend that projects apply Standard Mitigation Measures (SMM) and appropriate Best Available Mitigation Measures (BAMM) when a project exceeds Level A thresholds and that projects apply SMM, BAMM, and special BAMM when a project exceeds Level B thresholds. Projects that cannot mitigate emissions to levels below the Level B thresholds are considered significant.

On November 14, 2000, the Shasta County Air Pollution Board approved a policy document establishing guidelines for toxic health risk assessments. Under these guidelines, the air pollution control officer can approve a new source if the cumulative excess cancer risk to the nearest sensitive receptor is less than 10 in a million and the total hazard index is less than or equal to one.

7.0 MITIGATION MEASURES

The following mitigation measures describe several specific actions to reduce construction combustion and fugitive dust emissions. Application of SMM is required in order to strive toward the General Plan policy of a 20 percent reduction in emissions to address small-scale cumulative effects. SMM applicable to this proposed project addresses primarily short-term impacts related to construction and are standard development regulations promulgated in California Building Code and Shasta County grading permits.

Prior to issuance of a grading permit, the project applicant shall submit a grading plan for review and approval by the Shasta County Building Department. The following specifications shall be included to reduce short-term air quality impacts attributable to the proposed project:

1. Nontoxic soil stabilizers shall be applied according to manufacturer's specification to all inactive construction areas (previously graded areas inactive for ten days or more).

2. All grading operations shall be suspended when winds (as instantaneous gusts) exceed 20 miles per hour.
3. Temporary traffic control shall be provided as appropriate during all phases of construction to improve traffic flow (e.g., flag person).
4. Construction activities that could affect traffic flow shall be scheduled in off-peak hours.
5. Active construction areas, haul roads, etc., shall be watered at least twice daily or more as needed to limit dust.
6. Exposed stockpiles of soil and other backfill material shall either be covered, watered, or have soil binders added to inhibit dust and wind erosion.
7. All truck hauling solid and other loose material shall be covered or should maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the trailer). This provision is enforced by local law enforcement agencies.
8. All public roadways used by the project contractor shall be maintained free from dust, dirt, and debris caused by construction activities. Streets shall be swept at the end of the day if visible soil materials are carried onto adjacent public paved roads. Wheel washers shall be used where vehicles enter and exit unpaved roads onto paved roads, or trucks and any equipment shall be washed off leaving the site with each trip.
9. All vehicle speeds on unpaved surfaces shall be limited to 15 miles per hour.
10. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
11. A publicly visible sign shall be posted with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
12. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.

13. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
14. Where access to alternative sources of power are available, portable diesel engines shall be prohibited.
15. All off-road equipment larger than 50 horsepower shall have engines that meet or exceed USEPA or CARB Tier 3 off-road emission standards and Level 3 Diesel Particulate Filters. Other measures may be the use of added exhaust devices, or a combination of measures, provided that these measures are approved by the agency and demonstrated to reduce community risk impacts to less than significant.
16. Haul truck shall be 2010 model year trucks or newer (a gross vehicle weight rating of at least 14,001 pounds), or best commercially available equipment, which meet CARB's 2010 engine emissions standards at 0.01 g/hp-hour of particulate matter and 0.20 g/hp-hour of NO_x emissions or newer, cleaner trucks.
17. The VOC architectural coating limits specify that the use of paints and solvents with a VOC content of 100 grams per liter or less for interior and 150 grams per liter or less for exterior surfaces shall be required.

8.0 CONSTRUCTION AIR EMISSIONS INVENTORY

Intermittent (short-term construction emissions that occur from activities, such as site-grading, paving, and building construction) air quality impacts related to the proposed project were evaluated. The emissions generated from these construction activities include:

- Dust (including PM₁₀ and PM_{2.5}) primarily from "fugitive" sources (i.e., emissions released through means other than through a stack or tailpipe) such as material handling and travel on unpaved surfaces; and
- Combustion exhaust emissions of criteria air pollutants (ROG, NO_x, CO, PM₁₀, and PM_{2.5}) primarily from operation of heavy off-road construction equipment, haul trucks, (primarily diesel-operated), and construction worker automobile trips (primarily gasoline-operated).
- VOC as ROG primarily from "fugitive" sources such as architectural coating and paving.

Construction-related fugitive dust emissions would vary from day to day, depending on the level and type of activity, silt content of the soil, and the weather. High winds (greater than 10 miles per hour) occur infrequently in the area, less than two percent of the time. In the absence of mitigation, construction activities may result in significant quantities of dust, and as a result, local visibility and PM₁₀ concentrations may be adversely affected on a temporary and intermittent basis during construction. In addition, the fugitive dust generated by construction would include not only PM₁₀, but also larger particles, which would fall out of the atmosphere within several hundred feet of the site and could result in nuisance impacts.

Erosion control measures and water programs are typically undertaken to minimize these fugitive dust and particulate emissions. A dust control efficiency of over 50 percent due to daily watering and other measures (e.g., limiting vehicle speed to 15 mph, management of stockpiles, screening process controls, etc.) was used. One water application per day reduces fugitive dust by 34 percent, two water applications per day reduce fugitive dust by 55 percent, and three water applications per day reduces fugitive dust by 61 percent. Mitigation Measures included to reduce fugitive dust impacts are presented in **Section 7**.

Construction of the sawmill operation would require mainly grading and paving and is anticipated to take approximately seven months during 2023. Typically, for the sawmill operation, construction activities would occur for ten hours per day (6:00 am to 4:30 pm) on Monday through Friday with occasional work on Saturday. Construction would include 15 daily onsite employees; each traveling 12 miles per one-way trip. No demolition would be required for the proposed project and no soil/materials export/import would be required. A total of 9.7 acres would be graded, of which one acre would be paved, 6.7 acres would be unpaved, and two acres would be graveled. Grading of the project site would be followed by building/facility construction involving cranes, forklifts, loaders, generators, welders, and compressors.

Table 3: Daily Unmitigated Construction Emissions for Proposed Project shows the estimated daily unmitigated emissions for construction related emissions (including combustion engine and fugitive dust emissions) for the proposed project. The total construction emissions as well as the contribution from employee vehicle trips, pickup/delivery trucks, haul trucks, and off-road equipment are presented. The off-road equipment represents the largest contribution to the total construction emissions.

Table 3
Daily Unmitigated Construction Emissions (pounds) for Proposed Project

Emission Source	ROG	CO	NO_x	PM₁₀	PM_{2.5}
Proposed Project	3.42	29.0	34.6	10.9	5.03
Significance Thresholds (Level A)	25	-	25	80	-
Significance Thresholds (Level B)	137	-	137	137	-

Source: RCH Group, 2022

The daily unmitigated NO_x construction emissions would potentially exceed the SCAQMD thresholds of significance (Level A). Therefore, appropriate mitigation measures are required (such as USEPA and CARB Tier 3 or better engine emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower and periodic watering).

Table 4: Daily Mitigated Construction Emissions for Proposed Project shows the estimated daily mitigated emissions for construction related emissions (including combustion engine and fugitive dust emissions) for the proposed project. Even with mitigation, the NO_x emissions would be above the SCAQMD Level “A” threshold (Level A). However, while an exceedance of the level “A” threshold must be addressed through the application of appropriate SMM and BMM in accordance with the Shasta County General Plan, the level “A” threshold is not used to determine whether the impact is significant or adequately mitigated to a less-than-significant level. Project construction emissions are below the Level B thresholds; therefore, construction impacts would be less-than-significant with mitigation. Mitigation Measures included to reduce NO_x emissions impacts are presented in **Section 7**.

Table 4
Daily Mitigated Construction Emissions (pounds) for Proposed Project

Emission Source	ROG	CO	NO _x	PM ₁₀	PM _{2.5}
Proposed Project	1.91	37.6	30.0	4.04	1.69
Significance Thresholds (Level A)	25	-	25	80	-
Significance Thresholds (Level B)	137	-	137	137	-

Source: RCH Group, 2022

Using standard fuel consumption estimates, construction activities associated would require approximately 48,180 gallons of diesel fuel.¹⁶

Supporting information for the construction emissions inventory is found in **Attachment A: Construction Air Emissions Inventory**.

Air Emission Calculation Methodology

Air emission sources include combustion exhaust from on-road vehicles such as construction worker vehicles, pickup/delivery trucks, haul trucks, and construction equipment such as backhoes, loaders, and graders.

¹⁶ Fuel usage is estimated using the CO₂ emission estimate and a 10.15 kgCO₂/gallon conversion factor for diesel fuel,, https://www.epa.gov/sites/production/files/2018-03/documents/emission-factors_mar_2018_0.pdf

On-Road Vehicles

Vehicular emissions were computed using the CARB's emission factor model, CalEEMod, to estimate on-road emissions. Haul trucks were modeled using the T6 single construction haul truck classification, which is a heavy-heavy duty truck emission factor for public vehicles. Criteria pollutant emissions associated with on-road vehicles were calculated by combining the activity information with emissions factors, in grams per mile, derived using the EMFAC emissions model. Emissions calculations were based on **Equation 1**. EMFAC emissions factors were developed for employee vehicles and haul trucks and include exhaust, as well as brake and tire wear.

Equation 1

$$\text{Emission Rate (tons/year)} = \text{Emission Factor (gram/mile)} * \text{trips per day} * \text{miles per trip} * \text{days/year} * (453.59/2000 \text{ tons/gram})$$

$$\text{Emission Rate (pounds/day)} = \text{Emission Factor (gram/mile)} * \text{trips per day} * \text{miles per trip} * (1/453.59 \text{ pounds/gram})$$

Off-Road Equipment

Construction of the proposed project would require the use of heavy-duty equipment, such as loaders and cranes. Emission factors from CalEEMod were used. Emissions from off-road equipment activities were estimated based on the projected activity schedule, the number of pieces of equipment, the types of equipment, equipment utilization rates, equipment horsepower, and load factor (i.e., percent of full throttle).

This information was applied to criteria air pollutant emissions factors, in grams per horsepower-hour, primarily derived using CalEEMod. **Equation 2** outlines how off-road construction equipment emissions were computed.

Equation 2

$$\text{Emission Rate (tons/year)} = \text{Emission Factor (gram/hp-hour)} * \text{size (hp)} * \text{hours of operation per year} * \text{Load Factor} * \text{usage factor} * (453.59/2000 \text{ tons/gram})$$

$$\text{Emission Rate (pounds/day)} = \text{Emission Factor (gram/hp-hour)} * \text{size (hp)} * \text{hours of operation per day} * \text{Load Factor} * \text{usage factor} * (1/453.59 \text{ pounds/gram})$$

Fugitive Dust from Construction Activities

Fugitive dust emissions from site preparation, grading equipment passes, soil movement, unloading/loading of materials, and other construction-related activities is based on work performed by Midwest Research Institute. An emission factor for worst-case conditions of 0.42-ton PM₁₀ per acre-month was used. Worst-case refers to construction sites with active large-scale earth moving operations

appropriate for large-scale construction operations which involve substantial earthmoving operations without control measures.

Given the size of the proposed project, the emission factor for worst-case conditions of 0.42-ton PM₁₀ per acre-month was used for the unmitigated condition. An emission factor of 0.11-ton PM₁₀ per acre-month was used assuming a dust control effectiveness of 75 percent, which is based on the estimated control effectiveness of watering, reducing vehicle speed on unpaved surface, and other measures. The ratio of PM_{2.5} to PM₁₀ was assumed to be 21 percent for construction activities.¹⁷

9.0 OPERATIONAL AIR EMISSIONS INVENTORY

The air quality analysis of operations includes a review of criteria air pollutant emissions such as CO, NO_x, SO₂, VOC as ROG, coarse particulate or PM₁₀, and fine particulate or PM_{2.5}.

Supporting information for the operational emissions inventory is found in **Attachment B: Operational Air Emissions Inventory**. Emission sources associated with the proposed project include the sawmill facility operation including off-road equipment and motor vehicles (employee trips, deliveries, and haul trucks).

Once construction is completed the sawmill operations would occur at the project site from 7:00 a.m. to 6:00 p.m. on Monday through Saturday. The sawmill operations are expected to begin in August of 2023. The sawmill would operate for 240 days of the year (12 hours per day) while the two drying kilns and associated natural gas boiler would operate 350 days per year (24 hours per day). Approximately 30 employees would be onsite.

Sawmill Operation

Up to 90,000 tons per year of logs would be received based on 375 tons per day and five operating days per week (eight to ten hours per day). The sawmill would be located within a building without negative air.¹⁸ Exhaust through a recovery cyclone is anticipated. Lumber is then dried in the two kilns. Drying time depends on species and can range between 65 to 240 hours. Assuming two days off between batches for loading and unloading, up to 25,500,000 board feet can be dried in the kilns annually. The maximum kiln temperature would be 180°F.

¹⁷ Western Regional Air Partnership, *WRAP Fugitive Dust Handbook*, September 7, 2006, https://www.wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf

¹⁸ Enclosures can range from windbreaks consisting of fabric walls to fully enclosed buildings. Depending on the amount of enclosure, a typical control efficiency of 50 to 90 percent, may be applied. The level of control is dependent on the ratio of openings in the enclosure, such as open sides, doors, and windows. A value of 75 percent was used for this analysis based on the ratio of open spaces in the enclosure.

After drying the lumber is further processed in the mill. Finished lumber would be stored in the lumber storage area. Sawdust from the sawmill would be mixed into the feedstock pile for the bioenergy facility. Sawdust would be transported to the feedstock pile via conveyor or other means. Scrap from the mill would be processed in the grinder/planer for bioenergy facility feedstock.

Water use would be approximately 7.5 million gallons per year for dust suppression and sawmill. The facility would use approximate 10,070 kilowatts per day (or 2,417,040 kilowatts per year) of electricity. The primary source of power for the sawmill would be Pacific Gas & Electric. The electrical system may be integrated with the Hat Creek bioenergy facility. The gasification system would provide electricity to operations onsite and offsite but would not be operational in the first year of sawmill operations. The natural gas boiler would use approximately 70 million cubic feet per year. The boiler would operate for 24 hours per day and 350 days per year at an average load capacity of approximately 33 percent.

On-Road Vehicles

Operational-related vehicular emissions were computed using the CARB's emission factor model, EMFAC, to estimate on-road emissions. Haul trucks were modeled using the T6 single construction haul truck classification, which is a heavy-heavy duty truck emission factor for public vehicles. Criteria air pollutant emissions associated with on-road vehicles were calculated by combining the activity information with emissions factors, in grams per mile, derived using the EMFAC emissions model. Emissions calculations were based on **Equation 1**. The EMFAC emissions factors were developed for employee vehicles and haul trucks and include exhaust, as well as brake and tire wear. **Table 5: Emissions Factors (gram/mile) for On-Road Vehicles** displays the emission factors for employee vehicles and haul trucks.

Table 5
Emissions Factors (gram/mile) for On-Road Vehicles

Vehicle Type	ROG	CO	NO _x	CO ₂	CH ₄	N ₂ O	PM ₁₀	PM _{2.5}
Employee Vehicles	0.01	0.97	0.07	306	0.003	0.006	0.02	0.01
Haul Trucks	0.01	0.03	0.45	1,072	0.000	0.169	0.06	0.02
Pickup Trucks	0.02	1.23	0.11	357	0.005	0.009	0.02	0.01

Source: CARB EMFAC Emissions Model.

Using standard fuel consumption estimates, operational activities associated with haul truck trips annually would require approximately 192,756 gallons of diesel fuel¹⁹ and 32,000 gallons of gasoline²⁰

The average truck traffic generated by existing operations at the site is approximately 14 trips per day. The bioenergy facility is anticipated to generate an additional 10 truck trips and four employee trips per day when operational. The proposed project would require an additional 30 employees, generating an additional 30 employee commute trips each day at 10 miles per one-way trip. Based on the projected board feet production per year and assumed 240 working days, the project would result in an average of 23 roundtrips per day for log delivery and lumber export. Up to 15 trucks per day would deliver logs to the project site for the sawmill operation at 70 miles one way trip. An average of four byproduct truck loads would be made each day for a 10 miles one way trip. An average of four lumber truck shipments would be made each day for a 140 miles one way trip.

Using standard fuel consumption estimates, haul trucks would require approximately 87,135 gallons of diesel fuel annually and employee vehicles would require approximately 4,970 gallons of gasoline fuel annually.²¹

Off-Road Equipment

The operation of the proposed project would require the use of heavy-duty equipment, such as loaders and forklifts. Emission factors from the OFFROAD emissions model were used. Emissions from off-road equipment activities were estimated based on the projected activity schedule, the number of pieces of equipment, the types of equipment, equipment utilization rates, equipment horsepower, and load factor (i.e., percent of full throttle). The offroad equipment would operate for 12 hours per day and 240 days per year.

This information was applied to criteria air pollutant emissions factors, in grams per horsepower-hour, primarily derived using the OFFROAD emissions model. **Equation 2** outlines how off-road operational equipment emissions were computed, and the emissions factors used in this assessment are summarized, by equipment type within **Table 6: Emissions Factors (g/hp-hour) for Off-road Equipment**.

¹⁹ Fuel usage is estimated using the CO₂ emission estimate and a 10.15 kgCO₂/gallon conversion factor for diesel fuel,, https://www.epa.gov/sites/production/files/2018-03/documents/emission-factors_mar_2018_0.pdf

²⁰ Fuel usage is estimated using the CO₂ emission estimate and a 8.91 kgCO₂/gallon conversion factor for gasoline fuel,, https://www.epa.gov/sites/production/files/2018-03/documents/emission-factors_mar_2018_0.pdf

²¹ Fuel usage is estimated using the CO₂ emission estimate and a 10.15 kgCO₂/gallon conversion factor for diesel fuel,, https://www.epa.gov/sites/production/files/2018-03/documents/emission-factors_mar_2018_0.pdf

Table 6
Emissions Factors (g/hp-hour) for Off-road Equipment

Equipment Type	HP	Daily	Annual	LF	ROG	CO	NO _x	CO ₂	CH ₄	PM ₁₀	PM _{2.5}
		Hours	Days								
Forklift (3)	85	12	240	0.20	0.06	0.73	0.55	106	0.001	0.03	0.03
Log Loader (2)	300	12	240	0.50	0.11	2.29	0.40	403	0.003	0.02	0.02
Water Truck (1)	200	12	240	0.38	0.14	1.52	1.19	202	0.002	0.08	0.07

Source: CARB OFFROAD Emissions Model.

Using standard fuel consumption estimates, off-road equipment (including engines associated with the sawmill and grinder/planer) would require approximately 42,080 gallons of diesel fuel.²²

Sawmill

Up to 90,000 tons of logs each year and 375 tons per day (or approximate 240 days per year and 12 hours per day) would be processed in the sawmill. The sawmill would produce approximately 180 green tons of material in chips, bark, and sawdust per day (or 43,200 green tons per year). Materials such as sawdust, bark, and waste lumber would be used as feedstock for the bioenergy facility. **Table 7: Emissions Factors for Sawmill** provides the particulate matter emission factors (in pounds per ton-logs or pounds per bone dry tons of material) for the sawmill operations. Emission factors were based on the USEPA's *Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country*.²³ It was assumed that ten material drops would occur per day.

Table 7
Emissions Factors for Sawmill

Equipment Type	PM	% PM ₁₀	PM ₁₀	% PM _{2.5}	PM _{2.5}	Units
Sawing (Cyclone)	0.50	50	0.25	30	0.15	lb/ton log
Sawing (Cyclone and enclosure)	0.125	50	0.0625	30	0.0375	lb/ton log
Drop" of "wet" material	0.00075		0.00035		0.00005	lb/ton material
Drop" of "dry" material	0.0015		0.0007		0.0001	lb/ton material
Pneumatically convey material into target box	0.1	85	0.085	50	0.05	lb/ton material

Source: United States Environmental Protection Agency, *Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country*, <https://www.epa.gov/caa-permitting/technical-memoranda-sawmills-region-10>

²² Fuel usage is estimated using the CO₂ emission estimate and a 10.15 kgCO₂/gallon conversion factor for diesel fuel,, https://www.epa.gov/sites/production/files/2018-03/documents/emission-factors_mar_2018_0.pdf

²³ United States Environmental Protection Agency, *Technical Memoranda for Sawmills, Region 10* <https://www.epa.gov/caa-permitting/technical-memoranda-sawmills-region-10>

"Drop" of "wet" material from one surface to another including, but not limited to, (a) each mechanical conveyance drop between point of generation and storage bin (but not including bin unless open to atmosphere) (b) loadout from storage bin into a truck bed or railcar and (c) drop onto a pile. Apply EF to each "drop."

"Drop" of "dry" material from one surface to another including, but not limited to, (a) each mechanical conveyance drop between point of generation and storage bin (but not including bin unless open to atmosphere) (b) loadout from storage bin into a truck bed or railcar and (c) drop onto a pile. Apply EF to each "drop."

The "material" in this entry refers to bark, hogged fuel, green chips, dry chips, green sawdust, dry sawdust, shavings, and any other woody byproduct of lumber production.

The sawmill would be located within a building without negative air. Exhaust through a recovery cyclone is anticipated. Sawmill exhaust would be routed through ducting as part of the roof with vent tube. Sawdust collection would occur at three collection areas within the building to remove sawdust into collection bins. Sawmill building would contain ventilation/doors on each end of building to allow logs to enter mill and to allow finished lumber stacking for drying.

Equation 2 outlines how sawmill engine combustion emissions were computed, and the emissions factors used in this assessment are summarized within **Table 8: Emissions Factors (g/hp-hour) for Sawmill Engine**. Sawmill engine would operate 12 hours per day while occurring over 240 days per year.

**Table 8
Emissions Factors (g/hp-hour) for Sawmill Engine**

Equipment Type	HP	Daily	Annual	LF	ROG	CO	NO _x	CO ₂	CH ₄	PM ₁₀	PM _{2.5}
		Hours	Days								
Sawmill	60	12	240	0.50	0.35	1.78	3.19	216	0.002	0.24	0.22

Source: CARB OFFROAD Emissions Model.

Grinder/Planer

To approximate the particulate emissions for wood grinding, the emission factor for "Log Debarking" from USEPA's AP-42, Table 10.3-1 of 0.024 pounds of particulate matter per ton of material processed was used with the throughput quantity of wood processed. Approximately 60 percent of the particulate emissions are assumed to be PM₁₀ and 25 percent of the PM₁₀ emissions are assumed to be PM_{2.5}. Water suppression would also provide an estimated 50 percent abatement of particulate emissions. **Equation 3** outlines how grinder/planer particulate matter emissions were computed. The grinder/planer would produce approximately 20 green tons of material in planer shavings and hogged trim per day (or 4,800 green tons per year). The grinder/planer would be enclosed within a building and would exhaust through a recovery cyclone.

Equation 3

$$PM_{10} \text{ Emission Rate (tons/year)} = \text{Throughput (tons of material/year)} * \text{Emission Factor (0.024 pounds PM/tons of material)} * 0.6 \text{ pounds } PM_{10}/\text{pounds PM} * \text{ton}/2,000 \text{ pounds}$$

$$PM_{10} \text{ Emission Rate (pounds/day)} = \text{Throughput (pounds of material/day)} * \text{Emission Factor (0.024 pounds PM/tons of material)} * 0.6 \text{ pounds } PM_{10}/\text{pounds PM}$$

As previously provided, **Equation 2** outlines how grinder/planer engine combustion emissions were computed, and the emissions factors used in this assessment are summarized within **Table 9: Emissions Factors (g/hp-hour) for Grinder/Planer Engine**. Grinder/planer engine was assumed to operated 12 hours per day while occurring during 240 days per year.

Table 9
Emissions Factors (g/hp-hour) for Grinder/Planer Engine

Equipment Type	HP	Daily Hours	Annual Days	LF	ROG	CO	NO _x	CO ₂	CH ₄	PM ₁₀	PM _{2.5}
Grinder/Planer	950	12	240	0.42	0.11	0.75	0.32	405	0.003	0.01	0.01

Source: CARB OFFROAD Emissions Model.

Drying Kilns

Lumber would be dried in the two kilns. Drying time depends on species and can range between 65 to 240 hours. Assuming two days off between batches for loading and unloading, up to 25,500,000 board feet can be dried in the kilns annually (or 105,00 board feet per day). The kilns would operate for 24 hours per day and 350 days per year. The maximum kiln temperature would be 180°F and thus, the appropriate emission factors were used.²⁴ VOC emission factors within USEPA's Region 10 HAP and VOC Emission Factors for Lumber Drying²⁵ were used. The expected species of wood to be processed are 60 percent of ponderosa pine, 35 percent of white fir, and 5 percent of Douglass fir. **Table 10: Emissions Factors (pounds/1,000 board feet) for Drying Kilns** provides the VOC and HAP emission factors for various wood species. Therefore, a health risk assessment was completed.²⁶ The air toxics emissions are displayed within **Attachment C: Health Risk Assessment Methodology and Assumptions**.

²⁴ The VOC emissions increases with higher kiln temperature.

²⁵ United States Environmental Protection Agency, Region 10 HAP and VOC Emission Factors for Lumber Drying, January 2021, <https://www.epa.gov/system/files/documents/2021-07/epa-region-10-lumber-drying-ef-january-2021.pdf>

²⁶ The nearest sensitive receptors (i.e., school, residence) are approximately 3,000 feet to the north of the project site.

Table 10
Emissions Factors (pounds/1,000 board feet) for Drying Kilns

Species	VOC	Methanol	Formaldehyde	Acetaldehyde	Propionaldehyde	Acrolein
Ponderosa Pine	2.44911	0.05681	0.002863	0.0340	0.0010	0.0026
White Fir	0.44927	0.1034	0.00116	0.0550	0.0003	0.0009
Incense Cedar	0.44927	0.1034	0.00116	0.0677	0.0004	0.0012
Douglas Fir	0.8567	0.0443	0.00124	0.0275	0.0003	0.0005
Oak	0.3580	--	--	--	--	--

Source: United States Environmental Protection Agency, Region 10 HAP and VOC Emission Factors for Lumber Drying, January 2021, <https://www.epa.gov/system/files/documents/2021-07/epa-region-10-lumber-drying-ef-january-2021.pdf>

Equation 4 outlines how VOC and HAP emissions from the two kilns were computed. The kilns would operate for approximately 350 days per year and 24 hours per day.

Equation 4

$$\text{Emission Rate (tons/year)} = \text{Throughput (1,000 board feet/year)} * \text{Emission Factor (pounds/1,000 board feet)} * \text{ton/2,000 pounds}$$

$$\text{Emission Rate (pounds/day)} = \text{Throughput (1,000 board feet/day)} * \text{Emission Factor (pounds/1,000 board feet)}$$

The two kilns would also release a variety of air toxics, such as, acetaldehyde, acrolein, formaldehyde, and methanol. However, the kilns are more than 3,000 feet from the nearest sensitive receptor, thus, a health risk assessment was not completed. The air toxics emissions are found in **Attachment B: Operational Air Emissions Inventory**.

Natural Gas Boiler

The proposed project would include a natural gas fired boiler with a capacity of approximately 25.5 million British thermal units (Btu) per hour. Emissions from natural gas boilers were based on USEPA emission standards. The NOx emissions factor for natural gas boilers was based on the NOx limit of 30 parts per million (ppm) for boilers greater than 10 million Btu/hour heat input. Boiler combustion emissions were computed, and the emissions factors used in this assessment are summarized within **Table 11: Emissions Factors (pounds/million cubic feet) for Natural Gas Boiler**. The natural gas boiler would use approximately

70 million cubic feet per year. The boiler would operate for 24 hours per day and 350 days per year at an average load capacity of approximately 33 percent (or approximately 8.5 million BTU per hour).²⁷

Table 11
Emissions Factors (pounds/million cubic feet) for Natural Gas Boiler

Equipment Type	ROG	CO	NO _x	CO ₂	CH ₄	PM ₁₀	PM _{2.5}
Boiler	5.5	98	11	120,000	2.3	7.6	7.6

Source: CARB CALEEMOD Emissions Model.

Operational Emissions Summary

The proposed project would allow operation of a sawmill near the southwest boundary of the project site. The sawmill would receive approximately 15 million board feet of logs each year and produce up to 30 million board feet of lumber. The sawmill operation would produce pallet boards, fence posts, fence boards, and various other specialty products. The operation would include a sawmill, grinder/planer, and kilns that would produce specialty softwood products. Air emissions would occur during the operation of these activities.

Air pollutant emissions of concern are primarily particulate matter from sawing and grinding and VOC/ROG emissions from drying²⁸. Water sprays would be used to control particulate matter emissions.

Table 12: Daily Operational Emissions (pounds) for Proposed Project presents the daily operational emissions. A majority of the NO_x emissions would be from the operation of the boiler, a majority of the VOC/ROG emissions would be from the kilns, and a majority of the PM₁₀ and PM_{2.5} emissions would be from operation of the sawmill. As shown, the daily VOC/ROG emissions are greater than the significant thresholds (Level A). However, the daily emissions are less than the significant thresholds (Level B) for all pollutants, thus operational air quality impacts would be less than significant.

²⁷ The need to operate the boiler at full capacity would only occur during the start of a drying cycle - to warm the lumber up to temperature. The average demand for steam drying for an entire cycle with a specie mix of 60 percent Ponderosa Pine and 40 percent White Fir all Dimensional product would require 2,500 pounds per hour per 100' double track. Given the proposed project would use two 100' double tracks, the average steam demand would be 5,000 pounds per hour. Thus, the 15,000 pounds per hour rated capacity boiler (25.5 million Btu) would require an average steam demand of 5,000 pounds per hour (8.5 million Btu per hour).

²⁸ The maximum kiln temperature would be 180°F. The VOC emissions increase with higher kiln temperature. The kiln VOC emissions would be 117 pounds per day with a kiln temperature 180°F; effectively reducing the VOC emissions from 139 and 150 pounds per day with a kiln temperature of 200 and 210°F, respectively, which would result is a significant impact. Thus, operating the kiln temperature at 180°F eliminates a significant impact.

Table 12
Daily Operational Emissions (pounds) for Proposed Project

Emission Source	ROG	CO	NO _x	PM ₁₀	PM _{2.5}	SO _x
Area Sources	0.79	<0.01	<0.01	<0.01	<0.01	<0.01
Employee Vehicles	0.02	1.28	0.10	0.01	<0.01	<0.01
Off-road Equipment Onsite	1.52	23.6	8.85	0.52	0.48	
Offsite Haul Trucks	0.05	0.25	3.24	0.45	0.18	0.07
Kilns	117					
Natural Gas Boiler	3.30	58.8	6.60	4.56	4.56	0.36
Grinder/Planer	1.12	7.92	3.36	2.82	1.24	
Sawmill	0.28	1.41	2.53	46.5	24.3	
Total	124	93.3	24.7	54.8	30.8	0.44
Significance Thresholds (Level A)	25	-	25	80	-	-
Significance Thresholds (Level B)	137	-	137	137	-	-

Source: RCH Group, 2022

Table 13: Annual Operational Emissions (tons) for Proposed Project presents the annual operational emissions.

Table 13
Annual Operational Emissions (tons) for Proposed Project

Emission Source/Year	ROG	CO	NO _x	PM ₁₀	PM _{2.5}	SO _x
Area Sources	0.14	<0.01	<0.01	<0.01	<0.01	<0.01
Employee Vehicles	<0.01	0.15	0.01	<0.01	<0.01	<0.01
Off-road Equipment Onsite	0.18	2.84	1.06	0.06	0.06	<0.01
Offsite Haul Trucks	0.01	0.03	0.39	0.05	0.02	0.01
Kilns	21.3					
Natural Gas Boiler	0.19	3.43	0.39	0.27	0.27	0.02
Grinder/Planer	0.13	0.95	0.40	0.34	0.15	<0.01
Sawmill	0.03	0.17	0.30	5.58	2.92	<0.01
Total	22.0	7.57	2.55	6.30	3.41	0.03

Source: RCH Group, 2022

Supporting information for the operational emissions inventory are found in **Attachment B: Operational Air Emissions Inventory**.

Odor Impacts

Though offensive odors from stationary and mobile sources rarely cause any physical harm, they remain unpleasant and can lead to public distress, generating citizen complaints to local governments. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

Potential localized odor sources associated with proposed project operation-related activities could originate from fumes from the two kilns, sawmill, diesel exhaust from off-road haul equipment, and diesel exhaust from incoming and out-going diesel-fueled heavy-duty transport vehicles.

Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine the presence of a significant odor impact. Rather, often air districts recommend that odor analyses strive to fully disclose all pertinent information. The intensity of an odor source's operations and its proximity to sensitive receptors influences the potential significance of odor emissions. For example, San Joaquin Valley Unified Air Pollution Control District has identified some common types of facilities that have been known to produce odors, which includes facilities like wastewater treatment operations, sanitary landfills, composting facilities, and transfer stations.²⁹ Sawmill operations are not on the list of potential odor sources.

This screening level for potential odor sources can be used as a screening tool to qualitatively assess a project's potential to adversely affect area receptors. The project site is in a generally rural area surrounded by open space; the nearest residential receptors are located approximately ½ mile to the south and north of the project site. Notably, the primary wind direction is from the south and north. Odor emissions are highly dispersive, especially in areas with higher average wind speeds. However, odors disperse less quickly during inversions or during calm conditions and air stagnation, which hamper vertical mixing and dispersion during early morning and wintertime. An odor source with five or more confirmed complaints per year averaged over three years could be considered to have a significant impact. However, it should be recognized that there is not one piece of information that can solely be used to determine the significance of an odor impact. Therefore, based on the previous information, the proposed project odor impacts would be less than significant.

10.0 HEALTH RISK ASSESSMENT

The proposed project is expected to emit a variety of air toxics (including diesel particulate matter) and an HRA was completed to evaluate the health impacts of the proposed project as required by the SCAQMD's *Policy Establishing Guidelines for Toxics Health Risk Assessment*. The proposed project would constitute a new emission source of air toxics during operational activities. Studies have demonstrated

²⁹ San Joaquin Valley Unified Air Pollution Control District, Final Draft Guidance for Assessing and Mitigating Air Quality Impacts, March 19, 2015, <https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF>

that certain pollutants are human carcinogens and that chronic (long-term) inhalation exposure poses a chronic health risk.³⁰

Health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Individual cancer risk is the likelihood that a person exposed to air toxic concentrations over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. The maximally exposed individual (MEI) represents the worst-case risk estimate, based on a theoretical person continuously exposed for a lifetime at the point of highest compound concentration in the air. This is a highly conservative assumption since most people do not remain at home all day and on average residents change residences every 11 to 12 years. In addition, this assumption assumes that residents are experiencing outdoor concentrations for the entire exposure period.

The HRA estimates the incremental cancer risks to sensitive receptors in the vicinity of the proposed project, using emission rates (in pounds per hour) from the construction emissions inventory detailed in **Section 8** and the operations emissions inventory detailed in **Section 9**. The operational emission sources within the HRA include the steam kilns, offroad equipment such as loaders and the grinder and sawmill engines.³¹ Air toxics emission rates were input into the USEPA's AERMOD atmospheric dispersion model to calculate ambient air concentrations at receptors in the project vicinity. The HRA is intended to provide a worst-case estimate of the increased exposure by employing a standard emission estimation program, an accepted pollutant dispersion model, approved toxicity factors, and conservative exposure parameters.

In accordance with California Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*³², the HRA was accomplished by applying the highest estimated concentrations of TAC at the receptors analyzed to the established cancer potency factors and acceptable reference concentrations for non-cancer health effects. Increased cancer risks were calculated using the modeled air toxics concentrations and OEHHA-recommended methodologies for both child exposure (3rd trimester through two years of age) and adult exposure. The cancer risk calculations were based on applying the OEHHA-recommended age sensitivity factors and breathing rates, as well as fraction of time at home and an exposure duration of 30 years, to the air toxics

³⁰ Toxic air contaminants are a broad class of compounds known to cause morbidity or mortality. TAC are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., gasoline service stations, dry cleaners). TAC are typically found in low concentrations, even near their source (e.g., diesel particulate matter near a freeway). Because chronic exposure can result in adverse health effects, TAC are regulated at the regional, state, and federal level.

³¹ Given their limited and irregular use, the standby generators were not included in the HRA.

³² Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, February 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

concentration exposures. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing air pollutants. The supporting methodology and assumptions used in this HRA are provided in **Attachment C: Health Risk Assessment Methodology and Assumptions**.

These conservative methodologies overestimate both non-carcinogenic and carcinogenic health risk, possibly by an order of magnitude or more. Therefore, for carcinogenic risks, the actual probabilities of cancer formation in the populations of concern due to exposure to carcinogenic pollutants are likely to be lower than the risks derived using the HRA methodology. The extrapolation of toxicity data in animals to humans, the estimation of concentration prediction methods within dispersion models; and the variability in lifestyles, fitness and other confounding factors of the human population also contribute to the overestimation of health impacts. Therefore, the results of the HRA are highly overstated.

Burney Fall Resort RV Park and several residences are located beyond 3,000 feet to the northwest of the kilns.

Health Impacts at Existing Residences

The following describes the HRA results associated with existing sensitive receptors (residences) due to project construction activities and operations. **Table 14: Estimated Health Impacts at Existing Receptors** presents the maximum cancer risk from project construction activities and operational emissions.

Table 14
Estimated Health Impacts at Existing Receptors

Source	Cancer Risk	Chronic Impact	Chronic Impact
Proposed Project Construction	0.32	<0.01	<0.01
Proposed Project Offroad Equipment Operations	0.50	<0.01	<0.01
Proposed Project Grinder Engine Operations	0.20	<0.01	<0.01
Proposed Project Sawmill Engine Operations	0.31	<0.01	<0.01
Proposed Project Steam Kilns Operations	0.04	0.02	<0.01
Proposed Project Total	1.37	0.02	0.01
Significance Threshold	10	1.0	1.0
Potentially Significant (Yes or No)?	No	No	No

For a residential-receptors, the estimated cancer risk would be 1.37 per million (of which 0.32 per million is due to construction, 1.01 per million is due to operational onsite equipment (including loaders, grinder and sawmill engines, etc), and 0.04 per million is due to the steam kilns). The maximum exposed individual residence is located to the northwest of the project site.

Thus, the cancer risk and health impacts due to construction and operational activities would be less than the threshold of 10 per million and would be less than significant.

Non-Cancer Health Hazard at Existing Residences and Offsite Worker

Both acute (short-term) and chronic (long-term) adverse health impacts unrelated to cancer are measured against a hazard index (HI), which is defined as the ratio of the predicted incremental DPM exposure concentration from the Project to a reference exposure level (REL) that could cause adverse health effects. The REL are published by OEHHA based on epidemiological research. The ratio (referred to as the Hazard Quotient [HQ]) of each non-carcinogenic substance that affects a certain organ system is added to produce an overall HI for that organ system. The overall HI is calculated for each organ system. The impact is considered to be significant if the overall HI for the highest-impacted organ system is greater than 1.0.

The acute and chronic HI would be 0.02 and 0.01 for the residential receptors. The acute and chronic HI would be below the threshold of 1 and the health impact of the proposed project would therefore be less than significant.

11.0 GREENHOUSE GAS EMISSIONS

“Global warming” and “global climate change” are the terms used to describe the increase in the average temperature of the earth’s near-surface air and oceans since the mid-20th century and its projected continuation. Warming of the climate system is now considered to be unequivocal (IPCC, 2007), with global surface temperature increasing approximately 1.33 degrees Fahrenheit (°F) over the last 100 years. Continued warming is projected to increase global average temperature between 2 and 11°F over the next 100 years.

Natural processes and human actions have been identified as the causes of this warming. The International Panel on Climate Change (IPCC) concludes that variations in natural phenomena such as solar radiation and volcanoes produced most of the warming from pre-industrial times to 1950 and had a small cooling effect afterward. After 1950, however, increasing GHG concentrations resulting from human activity such as fossil fuel burning, and deforestation have been responsible for most of the observed temperature increase. These basic conclusions have been endorsed by more than 45 scientific societies and academies of science, including all of the national academies of science of the major industrialized countries. Since 2007, no scientific body of national or international standing has maintained a dissenting opinion.

Increases in GHG concentrations in the earth’s atmosphere are thought to be the main cause of human-induced climate change. GHG naturally trap heat by impeding the exit of solar radiation that has hit the earth and is reflected back into space. Some GHG occur naturally and are necessary for keeping the earth’s surface inhabitable. However, increases in the concentrations of these gases in the atmosphere during the last 100 years have decreased the amount of solar radiation that is reflected back into space, intensifying the natural greenhouse effect and resulting in the increase of global average temperature.

Gases that trap heat in the atmosphere are referred to as GHG because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHG has been implicated as the driving force for global climate change. The primary GHG are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), ozone, and water vapor.

CO₂ is primarily generated by fossil fuel combustion in stationary and mobile sources. CH₄ is emitted from biogenic sources, incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. In the United States, the top three sources of methane are landfills, natural gas systems, and enteric fermentation. CH₄ is the primary component of natural gas, which is used for space and water heating, steam production, and power generation. N₂O is produced by both natural and human related sources. Primary human related sources include agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. T

While the presence of the primary GHG in the atmosphere are naturally occurring, CO₂, CH₄, and N₂O are also emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Other GHG include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. Greenhouse gases are typically reported in "carbon dioxide-equivalent" measures (CO₂e).³³

There is international scientific consensus that human-caused increases in GHG have and will continue to contribute to global warming. Potential global warming impacts may include, but are not limited to, loss in snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.

California Green Building Standards Code

The California Green Building Standards Code or CALGreen is a regulatory code for all residential, commercial, and school buildings to meet uniform standards in building design intended to minimize impacts on climate change.

CALGreen does not prevent a local jurisdiction from adopting a more stringent code, as State law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction and demolition ordinances, and defers to them as the ruling guidance provided, they provide

³³ Because of the differential heat absorption potential of various GHG, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

a minimum 50-percent diversion requirement. CALGreen also provides exemptions for areas not served by construction and demolition recycling infrastructure. State building code provides the minimum standard, which buildings need to meet to be certified for occupancy. Enforcement is generally done by the local building official.

The development of CALGreen is intended to cause a reduction in GHG emissions from buildings; promote environmentally responsible, cost-effective, healthier places to live and work; reduce energy and water consumption; and respond to directives issued by the Governor, such as Assembly Bill 32, calling for the reduction of Statewide GHG emissions to 1990 levels by 2020. In short, CALGreen was established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impacts during and after project construction.

CALGreen contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. CALGreen provides design options allowing a project designer to determine how best to achieve compliance for a given site or building condition. CALGreen also requires building commissioning, which is a process for verifying that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

California Environmental Quality Act and Climate Change

Under CEQA, lead agencies are required to disclose the reasonably foreseeable adverse environmental effects of projects they are considering for approval. GHG emissions have the potential to affect the environment because they contribute to global climate change. In turn, global climate change has the potential to cause sea level rise, alter rainfall and snowfall patterns, and affect habitat.

Executive Order S-3-05

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

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

The executive order directed the Secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multiagency effort to reduce GHG emissions to the target levels. The Secretary will also

submit biannual reports to the governor and California Legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with the executive order, the secretary of CalEPA created the California Climate Action Team, made up of members from various State agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of California businesses, local governments, and communities and through State incentive and regulatory programs.

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

California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. This reduction will be accomplished by enforcing a Statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs CARB to develop and implement regulations to reduce Statewide GHG emissions from stationary sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires CARB to adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrived at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the State reduces GHG emissions enough to meet the cap. AB 32 also includes guidance on instituting emissions reductions in an economically efficient manner, along with conditions to ensure that businesses and consumers are not unfairly affected by the reductions. Using these criteria to reduce Statewide GHG emissions to 1990 levels by 2020 would represent an approximate 25 to 30 percent reduction in current emissions levels. However, CARB has discretionary authority to seek greater reductions in more significant and growing GHG sectors, such as transportation, as compared to other sectors that are not anticipated to significantly increase emissions. Under AB 32, CARB must adopt regulations to achieve reductions in GHG to meet the 1990 emissions cap by 2020.

Climate Change Scoping Plan

AB 32 required CARB to develop a Scoping Plan that describes the approach California will take to reduce GHG to achieve the goal of reducing emissions to 1990 levels by 2020. The Scoping Plan was first approved by CARB in 2008 and must be updated every five years. The initial AB 32 Scoping Plan contains the main

strategies California will use to reduce the GHG that cause climate change. The initial Scoping Plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and nonmonetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 program implementation fee regulation to fund the program. In August 2011, the initial Scoping Plan was approved by CARB.

The 2013 Scoping Plan Update builds upon the initial Scoping Plan with new strategies and recommendations. The 2013 Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The 2013 Update defines CARB climate change priorities for the next five years and sets the groundwork to reach California's long-term climate goals set forth in Executive Orders S-3-05 and B-16-2012. The 2013 Update highlights California progress toward meeting the near-term 2020 GHG emission reduction goals defined in the initial Scoping Plan. In the 2013 Update, nine key focus areas were identified (energy, transportation, agriculture, water, waste management, and natural and working lands), along with short-lived climate pollutants, green buildings, and the cap-and-trade program. On May 22, 2014, the First Update to the Climate Change Scoping Plan was approved by the Board, along with the finalized environmental documents. The 2017 Scoping Plan, approved on December 14, 2017, outlines options to meet California's aggressive goals to reduce GHGs by 40 percent below 1990 levels by 2030.

Executive Order No. B-30-15

On April 29, 2015, Executive Order No. B-30-15 was issued to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. Executive Order No. B-30-15 sets a new, interim, 2030 reduction goal intended to provide a smooth transition to the existing ultimate 2050 reduction goal set by Executive Order No. S-3-05 (signed by Governor Schwarzenegger in June 2005). It is designed so State agencies do not fall behind the pace of reductions necessary to reach the existing 2050 reduction goal. Executive Order No. B-30-15 orders "All State agencies with jurisdiction over sources of GHG emissions shall implement measures, pursuant to statutory authority, to achieve reductions of GHG emissions to meet the 2030 and 2050 targets." The Executive Order also states that "CARB shall update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent." The CARB is currently moving forward with a second update to the Climate Change Scoping Plan to reflect the 2030 reduction target. The updated Scoping Plan will provide a framework for achieving the 2030 target. In September of 2016, the AB 32 was extended to achieve reductions in GHG of 40 percent below 1990 levels by 2030. The new plan, outlined in SB 32, involves increasing renewable energy use, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

Federal Vehicle Standards

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the USEPA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014 through 2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the USEPA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO₂ emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program. On September 27, 2019, the USEPA and the NHTSA published the “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program.” (84 Fed. Reg. 51,310 (Sept. 27, 2019.)) The Part One Rule revokes California’s authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the USEPA finalized rulemaking for SAFE Part Two, which sets CO₂ emissions standards and corporate average fuel economy standards for passenger vehicles and light duty trucks, covering model years 2021 through 2026.

Shasta County Regional Climate Action Plan

In 2010, the SCAQMD initiated the regional climate action planning process. The primary objectives of the Shasta County Regional Climate Action Plan (RCAP) process are to contribute to the State’s climate protection efforts and to provide CEQA review streamlining benefits for development projects within the region’s four jurisdictions: the City of Anderson, the City of Redding, the City of Shasta Lake, and the unincorporated areas of Shasta County. To facilitate these objectives, the SCAQMD worked with the four jurisdictions to prepare community-specific, independent climate action plans that contain GHG emission inventories and forecasts, emission reduction measures, and implementation and monitoring programs. The Climate Action Plan provide a summary of jurisdictional GHG inventories and describe how each jurisdiction will achieve GHG reductions through local actions that contribute to the statewide GHG emissions reduction target defined in AB 32, the California Global Warming Solutions Act of 2006, CEQA guidelines, and other State guidance. The RCAP document serves as a collection of the individual climate action plans and demonstrates the region’s commitment to the State’s GHG reduction efforts. The RCAP was finalized in 2012, although not adopted by the SCAQMD.

Greenhouse Gas Regional Emission Estimates

Worldwide emissions of GHG in 2017 were estimated at 48.40 billion metric tons of CO₂e.³⁴ This value includes ongoing emissions from industrial and agricultural sources but excludes emissions from land use changes.

In 2019, the United States emitted about 6,558 million metric tons of CO₂e. Emissions increased from 2018 to 2019 by 1.7 percent. This decrease was driven largely by a decrease in emissions from fossil fuel combustion resulting from a decrease in total energy use in 2019 compared to 2018 and a continued shift from coal to natural gas and renewables in the electric power sector.³⁵ GHG emissions in 2018 (after accounting for sequestration from the land sector) were 10.2 percent below 2005 levels. GHG emissions in 2019 (after accounting for sequestration from the land sector) were 13 percent below 2005 levels.

According to the USEPA, a shift from coal to natural gas and the use of renewables in the electric power sector largely drove the reduction. In 2019, the transportation sector (i.e., motor vehicles, aircraft, trains, and ships/boats) contributed 1,876 million metric tons (approximately 29 percent of total emissions) of CO₂e to those 6,558 million metric tons, with aircraft emissions representing approximately ten percent of the transportation sector's emissions (i.e., approximately 188 million metric tons of CO₂e).³⁶

In 2020, California emitted approximately 369.2 million metric tons of CO₂e, 35.3 million metric tons of CO₂e lower than 2019 levels and 61.8 million metric tons of CO₂e below the 2020 GHG Limit of 431 million metric tons of CO₂e). The 2019 to 2020 decrease in emissions is likely due in large part to the impacts of the COVID-19 pandemic. Economic recovery from the pandemic may result in emissions increases over the next few years. As such, the total 2020 reported emissions are likely an anomaly, and any near-term increases in annual emissions should be considered in the context of the pandemic.³⁷

The highest proportion (38 percent) of GHG emissions were from the transportation sector. Emissions from the electricity sector account for 16 percent of the inventory. California used more electricity from zero-GHG sources (for the purpose of the GHG inventory, these include hydro, solar, wind, and nuclear energy) than from GHG-emitting sources for both in-state generation and total (in-state plus imports)

³⁴ World Resources Institute, *Climate Analysis Indicator Tool – Global Historical GHG Emissions*, https://www.climatewatchdata.org/ghg-emissions?end_year=2017&start_year=1990

³⁵ United States Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks*, April 2021, <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2019>

³⁶ United States Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks*, April 2021, <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks>

³⁷ California Air Resources Board, *Emissions Trends Report 2000-2020 (2022 Edition)*, <https://ww2.arb.ca.gov/ghg-inventory-data>

generation. The industrial sector has seen steady emissions in the past few years and remains at 23 percent of the inventory.³⁸

In 2008, unincorporated Shasta County's total baseline emissions included 3,131,054 metric tons of CO₂e. Stationary sources generated the largest portion of emissions at approximately 2,271,000 metric tons of CO₂e (73 percent of the total emissions). The transportation sector generated the second highest emissions in the unincorporated County at approximately 243,700 metric tons of CO₂e (8 percent of the total emissions), followed by energy consumption emissions at approximately 206,300 metric tons of CO₂e (7 percent of the total emissions). The forestry sector contributed approximately 156,500 metric tons of CO₂e (5 percent of total emissions), and the agriculture sector generated approximately 132,200 metric tons of CO₂e (4 percent of total emissions). The off-road vehicle/recreation, solid waste, and water (including water and wastewater) sectors comprise the remaining 4 percent of the emissions inventory.³⁹

Thresholds of Significance

The standards of significance applied to the analysis of potential GHG impacts are based on Appendix G of the *CEQA Guidelines*. According to Appendix G evaluation thresholds, the proposed Project would be considered to have significant air quality impacts if it were to:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

At this time, neither the SCAQMD nor the County has adopted numerical thresholds of significance for GHG emissions that would apply to the proposed project. The SCAQMD, however, recommends that all projects subject to CEQA review be considered in the context of GHG emissions and climate change impacts, and that CEQA documents include a quantification of GHG emissions from all project sources, as well as minimize and mitigate GHG emissions as feasible. The proposed project would generate GHG emissions through short-term construction activities and long-term operational activities.

Considering the lack of established GHG emissions thresholds that would apply to the proposed project, CEQA allows lead agencies to identify thresholds of significance applicable to a project that are supported by substantial evidence. Substantial evidence is defined in the CEQA statute to mean "facts, reasonable

38 California Air Resources Board, *Emissions Trends Report 2000-2020 (2022 Edition)*, <https://ww2.arb.ca.gov/ghg-inventory-data>

39 County of Shasta, Draft Shasta Regional Climate Action Plan, November 2012.

assumptions predicated on facts, and expert opinion supported by facts” (14 CCR 15384(b)).⁴⁰ Substantial evidence can be in the form of technical studies, agency staff reports or opinions, expert opinions supported by facts, and prior CEQA assessments and planning documents. Therefore, to establish additional context in which to consider the order of magnitude of the proposed project’s GHG emissions, this analysis accounts for the following considerations by other government agencies and associations about what levels of GHG emissions constitute a cumulatively considerable incremental contribution to climate change:

- Sacramento Metropolitan Air Quality Management District (SMAQMD) established thresholds, including 1,100 metric tons of CO₂e per year for the construction or operational phase of land use development projects, or 10,000 direct metric tons of CO₂e per year from stationary source projects.⁴¹
- Placer County Air Pollution Control District (PCAPCD) recommends a tiered approach to determine if a project’s GHG emissions would result in a significant impact. First, project GHG emissions are compared to the de minimis level of 1,100 metric tons of CO₂e per year. If a project does not exceed this threshold, it does not have significant GHG emissions. If the project exceeds the de minimis level and does not exceed the 10,000 metric tons of CO₂e per year bright line threshold, then the project’s GHG emissions can be compared to the efficiency thresholds. These thresholds are 4.5 metric tons of CO₂e per-capita for residential projects in an urban area, and 5.5 metric tons of CO₂e per-capita for residential projects in a rural area. For nonresidential development, the thresholds are 26.5 metric tons of CO₂e per 1,000 square feet for projects in urban areas, and 27.3 metric tons of CO₂e per 1,000 square feet for projects in rural areas. The PCAPCD bright-line GHG threshold of 10,000 metric tons of CO₂e per year is also applied to land use projects’ construction phase and stationary source projects’ construction and operational phases. Generally, GHG emissions from a project that exceed 10,000 metric tons of CO₂e per year would be deemed to have a cumulatively considerable contribution to global climate change.⁴²

⁴⁰ 14 CCR 15384 provides the following discussion: "Substantial evidence" as used in the Guidelines is the same as the standard of review used by courts in reviewing agency decisions. Some cases suggest that a higher standard, the so called "fair argument standard" applies when a court is reviewing an agency's decision whether or not to prepare an EIR. Public Resources Code section 21082.2 was amended in 1993 (Chapter 1131) to provide that substantial evidence shall include "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." The statute further provides that "argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence."

⁴¹ Sacramento Metropolitan Air Quality Management District, Guide to Air Quality Assessment in Sacramento County, May 2018, <http://www.airquality.org/Residents/CEQA-Land-Use-Planning/CEQA-Guidance-Tools>

⁴² Placer County Air Pollution Control District, 2017 CEQA Handbook – Chapter 2, Thresholds of Significance. <https://placerair.org/DocumentCenter/View/2047/Chapter-2-Thresholds-of-Significance-PDF>

- Bay Area Air Quality Management District (BAAQMD) has adopted 1,100 metric tons of CO₂e per year as a project-level bright-line GHG significance threshold that would apply to operational emissions from mixed land-use development projects, a threshold of 10,000 metric tons of CO₂e per year as the significance threshold for operational GHG emissions from stationary-source projects, and an efficiency threshold of 4.6 metric tons of CO₂e per service population per year.⁴³
- South Coast Air Quality Management District formed a GHG CEQA Significance Threshold Working Group to work with South Coast Air District staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. In December 2008, the South Coast Air Quality Management District adopted an interim 10,000 metric tons of CO₂e per-year screening level threshold for stationary source/industrial projects for which the South Coast Air Quality Management District is the lead agency (South Coast Air Quality Management District Resolution No. 08-35, December 5, 2008).

Shasta County recommends the use of SMAQMD GHG thresholds of CO₂e (1,100 metric tons of CO₂e per year for construction or 10,000 metric tons of CO₂e per year from stationary source projects).

As described, the 10,000 metric tons of CO₂e per year threshold is used by other air districts for industrial and/or stationary source emissions of GHG. Since the proposed project is an industrial project that includes stationary sources, the proposed project's GHG emissions were compared to the 10,000 metric tons of CO₂e per year quantitative threshold. The substantial evidence for this GHG emissions threshold is based on the expert opinion of various California air districts, which have applied the 10,000 metric tons of CO₂e per year threshold in numerous CEQA documents where those air districts were the lead agency.

Project GHG Emission Estimates

The estimated construction GHG emissions for the proposed project are 489 metric tons of CO₂e. Given the two-year construction period, the annual construction GHG emissions for the proposed project are 245 metric tons of CO₂e. As indicated, the 30-year amortized construction related GHG emissions would be approximately 16 metric tons of CO₂e per year. The results of the comparison are presented in **Table 15: Estimated Construction Greenhouse Gas Emissions for the Proposed Project**.

⁴³ Bay Area Air Quality Management District, CEQA Air Quality Guidelines, May 2017, http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

Table 15
Estimated Construction Greenhouse Gas Emissions (metric tons)

Construction	CO ₂ e Metric Tons
Total Construction Emissions	489
30-Year Amortized Construction Emissions	16.3

Source: RCH Group, 2022

The estimated operational GHG emissions are presented in **Table 16: Estimated Operational Greenhouse Gas Emissions for the Proposed Project**. The estimated operational GHG emissions for the proposed project are 5,903 metric tons of CO₂e. When including the 30-year amortized construction related GHG emissions, the total estimated construction and operational GHG emissions are 5,919 metric tons of CO₂e per year. Therefore, the proposed project would not have a significant impact related to a conflict with a GHG reduction plan.

Table 16
Estimated Operational Greenhouse Gas Emissions (metric tons)

Emission Source	CO ₂ e Metric Tons
Employee Vehicles	44
Off-road Equipment Onsite	427
Offsite Haul Trucks	884
Natural Gas Boiler	3,810
Grinder/Planer	465
Sawmill	19
Electrical Usage	226
Water	14
Waste	13
Total Operational Emissions	5,903
30-Year Amortized Construction Emissions	16
Total Construction plus Operational Emissions	5,919
Significance Threshold	10,000
Potential Significant?	No

Source: RCH Group, 2022

12.0 CUMULATIVE IMPACTS

Cumulative impacts are defined in CEQA as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines Section 15355). Stated in another way, “a cumulative impact consists of an impact which is

created as a result of the combination of the project evaluated together with other projects causing relating impacts” (CEQA Guidelines Section 15130 [a][1]).

Cumulative impacts would exist when either direct air quality impacts or multiple construction projects occur within the same area simultaneously. If a project were to produce air quality emissions simultaneously to a nearby construction project, the addition of both project emissions to the environment could exceed significance thresholds. For this project, the construction emissions were found to be less than significant. If a nearby project was to be under construction at the same time, that project would need to produce an additive emission close to the project site such that emissions would exceed thresholds. No cumulatively considerable construction projects are within at least 0.5 mile of the project site. Given this, a less than significant cumulative air quality impact would be expected during construction.

The project site is zoned industrial, and the project has been designed to be consistent with this zoning designation. The proposed sawmill facility would be located on the Hat Creek Construction and Materials Eastside Aggregates site, which currently operates as a construction yard, rock quarry, rock crushing and screening plant, and asphalt batch plant. The proposed project would not result in any changes to existing operations of the Hat Creek Construction and Materials Eastside Aggregates site. A bioenergy facility has also been approved at the project site but has not yet been constructed. The bioenergy facility is permitted to operate for 24 hours per day and seven days per week.⁴⁴

The Eastside Aggregates Project Environmental Impact Report⁴⁵ reports on the air emissions associated with the existing sources. The quarry operations are limited to 45,000 cubic yards of production per year while operating a maximum of 12 hours per day. The crushing and screening operations are also limited to 45,000 cubic yards of production per year while operating a maximum of 24 hours per day. The concrete batch plant is limited to 25,000 cubic yards per year while operating a maximum of 14 hours per day. The asphalt plant is limited to 100,00 cubic yards per year while operating a maximum of 16 hours per day. The crushing and screening operations potentially include the operation of a 1,150-kilowatt diesel generator.⁴⁶ Notably, the existing quarry, crushing and screening, and concrete operations have not operated for several year.

The Eastside Aggregates Project Environmental Impact Report reports that existing operations at the project site are permitted for a maximum of 500 roundtrips per day for the concrete batch plant trucks

⁴⁴ Eastside Aggregates Environmental Impact Report Addendum, August 18, 2016.

⁴⁵ Eastside Aggregates Environmental Impact report, November 2000, <https://www.shastacounty.gov/planning/page/final-environmental-impact-report-eastside-aggregates-project>

⁴⁶ Eastside Aggregates Environmental Impact Report Addendum, August 18, 2016.

and asphalt plant trucks. This number does not include roundtrips permitted for other industrial activities (60 roundtrips), employee commute vehicles (74 roundtrips), and miscellaneous vehicles (45 roundtrips). The average truck traffic generated by existing operations at the site is approximately 14 roundtrips per day.⁴⁷ The bioenergy facility is anticipated to generate an additional 10 roundtrip truck trips and 4 employee roundtrips per day when operational.⁴⁸ **Table 17** presents the estimate daily emissions for the existing sources.

The Eastside Aggregates Project Environmental Impact Report found that the existing sources were potentially significant and subject to mitigation associated with NO_x emissions. The total emissions from existing stationary sources were found to potentially exceed SCAQMD 2.1 thresholds for NO_x emissions. Most of the emissions were estimated to come from the diesel generator. The Eastside Aggregates Project Environmental Impact Report found that the project applicant shall use electrical power provided by existing power lines in the project vicinity for the crushing and screening operations (MM 4.3.1a), which would reduce any potential health impacts. With the implementation of other mitigation measures for fugitive dust (MM 4.3.1b through MM4.3.1i), the air quality impacts due to existing sources were found to be less than significant.

Table 17
Estimated Daily Operational Emissions for Existing Sources (pounds)

Emission Source	CO	NO _x	PM ₁₀	SO _x
Quarry	-	8.03	-	-
Crushing and Screening	-	7.03	-	-
Asphalt Plant	31.5	1.47	9.60	9.93
Concrete Plant	-	0.30	-	-
Diesel Generator	18.7	6.16	86.6	5.74
Vehicles	85.7	26.6	55.9	15.7
Total	136	29.6	152	21.1

Source: Eastside Aggregates Environmental Impact Report, August 2000.

For the proposed project, the operational emissions (see **Table 12**) were found to be less than significant. Therefore, a less than significant cumulative air quality impact would be expected during operations (i.e., the project would not have a cumulatively considerable significant impact on air quality).

The Eastside Aggregates Project Environmental Impact Report found that the existing sources would have a health impact of 0.00027 cancer per million persons (because of the asphalt operation), which is well below the significance threshold of 10.

⁴⁷ Eastside Aggregates Environmental Impact Report Addendum, August 18, 2016.

⁴⁸ Eastside Aggregates Environmental Impact Report Addendum, August 18, 2016.

For the proposed project, the health impacts (see **Table 14**) were found to be less than significant (i.e., values of 1.37 cancer per million person). Therefore, a less than significant cumulative air quality impact would be expected during operations (i.e., the project would not have a cumulatively considerable significant health impacts).

13.0 SUMMARY

Mitigation Measures are presented in **Section 7**. Daily construction emissions would not exceed the SCAQMD significance thresholds (Level B), as described in **Section 8**. These impacts are largely due to off-road construction equipment and to a much lesser degree due to off-site construction haul trucks. Daily operational emissions would not exceed the SCAQMD significance thresholds (Level B), as described in **Section 9**. The health impacts are less than significant as shown in **Section 10**. As shown in **Section 11**, the GHG emissions associated with construction activities and operations would be less than significant with mitigation.

Attachment A

Construction Emissions

Area, Water, Waste, and Electrical Operational Emissions

Burney Hat Creek Sawmill - Shasta County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Burney Hat Creek Sawmill

Shasta County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Light Industry	20.00	1000sqft	0.46	20,000.00	0
Other Asphalt Surfaces	9.70	Acre	9.70	422,532.00	0

1.2 Other Project Characteristics

Urbanization	Rural	Wind Speed (m/s)	2.7	Precipitation Freq (Days)	82
Climate Zone	3			Operational Year	2024
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

- Project Characteristics -
- Land Use -
- Construction Phase - Project Description
- Trips and VMT - Project Description
- Grading - Project Description
- Construction Off-road Equipment Mitigation - Basic and Enhanced Emission Reduction Measures
- Water And Wastewater - Applicant Data Response
- Vehicle Trips - Vehicle emissions via EMFAC
- Solid Waste -
- Stationary Sources - Process Boilers -
- Energy Use - Applicant data response

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	3.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	5.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstructionPhase	NumDays	300.00	144.00
tblEnergyUse	LightingElect	2.70	0.00
tblEnergyUse	NT24E	4.16	85.00
tblEnergyUse	NT24NG	3.84	0.00
tblEnergyUse	T24E	1.75	36.00
tblEnergyUse	T24NG	16.86	0.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblStationaryBoilersUse	AnnualHeatInput	0.00	214,300.00
tblStationaryBoilersUse	BoilerRatingValue	0.00	25.50
tblStationaryBoilersUse	DailyHeatInput	0.00	61.20
tblStationaryBoilersUse	NumberOfEquipment	0.00	1.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblVehicleTrips	ST_TR	1.99	0.00
tblVehicleTrips	SU_TR	5.00	0.00
tblVehicleTrips	WD_TR	4.96	0.00
tblWater	IndoorWaterUseRate	4,625,000.00	7,500,000.00

2.0 Emissions Summary

Burney Hat Creek Sawmill - Shasta County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.2269	1.8429	2.1784	5.3600e-003	0.3353	0.0742	0.4096	0.1081	0.0694	0.1775	0.0000	482.3936	482.3936	0.0700	0.0176	489.3931
2024	0.0232	0.0991	0.1521	2.6000e-004	2.2400e-003	4.7300e-003	6.9700e-003	6.0000e-004	4.3500e-003	4.9500e-003	0.0000	22.9019	22.9019	6.5100e-003	2.6000e-004	23.1415
Maximum	0.2269	1.8429	2.1784	5.3600e-003	0.3353	0.0742	0.4096	0.1081	0.0694	0.1775	0.0000	482.3936	482.3936	0.0700	0.0176	489.3931

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1352	1.7634	2.4258	5.3600e-003	0.2511	0.0152	0.2663	0.0746	0.0150	0.0897	0.0000	482.3933	482.3933	0.0700	0.0176	489.3928
2024	0.0190	0.1168	0.1788	2.6000e-004	2.2400e-003	9.6000e-004	3.2000e-003	6.0000e-004	9.5000e-004	1.5500e-003	0.0000	22.9019	22.9019	6.5100e-003	2.6000e-004	23.1415
Maximum	0.1352	1.7634	2.4258	5.3600e-003	0.2511	0.0152	0.2663	0.0746	0.0150	0.0897	0.0000	482.3933	482.3933	0.0700	0.0176	489.3928

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	38.38	3.18	-11.76	0.00	24.95	79.57	35.30	30.77	78.34	50.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2023	3-31-2023	0.9245	0.8132
2	4-1-2023	6-30-2023	0.6753	0.6410
3	7-1-2023	9-30-2023	0.4601	0.4367
6	4-1-2024	6-30-2024	0.1222	0.1357
		Highest	0.9245	0.8132

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1433	0.0000	2.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.3000e-004	5.3000e-004	0.0000	0.0000	5.7000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	223.9075	223.9075	0.0362	4.3900e-003	226.1216
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Stationary	0.5778	1.1787	10.2950	0.0630		0.7984	0.7984		0.7984	0.7984	0.0000	11,436.0595	11,436.0595	0.2192	0.0000	11,441.5393
Waste						0.0000	0.0000		0.0000	0.0000	5.0342	0.0000	5.0342	0.2975	0.0000	12.4720
Water						0.0000	0.0000		0.0000	0.0000	2.3794	3.7549	6.1343	0.2450	5.8400e-003	14.0007
Total	0.7211	1.1787	10.2953	0.0630	0.0000	0.7984	0.7984	0.0000	0.7984	0.7984	7.4136	11,663.7224	11,671.1360	0.7979	0.0102	11,694.1341

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1433	0.0000	2.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.3000e-004	5.3000e-004	0.0000	0.0000	5.7000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	223.9075	223.9075	0.0362	4.3900e-003	226.1216
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Stationary	0.5778	1.1787	10.2950	0.0630		0.7984	0.7984		0.7984	0.7984	0.0000	11,436.0595	11,436.0595	0.2192	0.0000	11,441.5393
Waste						0.0000	0.0000		0.0000	0.0000	5.0342	0.0000	5.0342	0.2975	0.0000	12.4720
Water						0.0000	0.0000		0.0000	0.0000	2.3794	3.7549	6.1343	0.2450	5.8400e-003	14.0007
Total	0.7211	1.1787	10.2953	0.0630	0.0000	0.7984	0.7984	0.0000	0.7984	0.7984	7.4136	11,663.7224	11,671.1360	0.7979	0.0102	11,694.1341

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Grading	Grading	1/1/2023	2/10/2023	5	30	
2	Construction	Building Construction	2/11/2023	8/31/2023	5	144	

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3	Paving	Paving	4/6/2024	5/3/2024	5	20
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Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 90

Acres of Paving: 9.7

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Construction	Cranes	1	7.00	231	0.29
Construction	Forklifts	3	8.00	89	0.20
Construction	Generator Sets	1	8.00	84	0.74
Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	8	20.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Construction	9	186.00	73.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Paving	6	15.00	0.00	50.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
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3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Use DPF for Construction Equipment

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1381	0.0000	0.1381	0.0548	0.0000	0.0548	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0498	0.5177	0.4208	9.3000e-004		0.0214	0.0214		0.0197	0.0197	0.0000	81.8028	81.8028	0.0265	0.0000	82.4642
Total	0.0498	0.5177	0.4208	9.3000e-004	0.1381	0.0214	0.1594	0.0548	0.0197	0.0745	0.0000	81.8028	81.8028	0.0265	0.0000	82.4642

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2400e-003	9.2000e-004	0.0111	3.0000e-005	3.6400e-003	2.0000e-005	3.6700e-003	9.7000e-004	2.0000e-005	9.9000e-004	0.0000	3.0178	3.0178	8.0000e-005	8.0000e-005	3.0434
Total	1.2400e-003	9.2000e-004	0.0111	3.0000e-005	3.6400e-003	2.0000e-005	3.6700e-003	9.7000e-004	2.0000e-005	9.9000e-004	0.0000	3.0178	3.0178	8.0000e-005	8.0000e-005	3.0434

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0538	0.0000	0.0538	0.0214	0.0000	0.0214	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0229	0.4497	0.5508	9.3000e-004		2.9200e-003	2.9200e-003		2.9200e-003	2.9200e-003	0.0000	81.8027	81.8027	0.0265	0.0000	82.4641
Total	0.0229	0.4497	0.5508	9.3000e-004	0.0538	2.9200e-003	0.0568	0.0214	2.9200e-003	0.0243	0.0000	81.8027	81.8027	0.0265	0.0000	82.4641

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2400e-003	9.2000e-004	0.0111	3.0000e-005	3.6400e-003	2.0000e-005	3.6700e-003	9.7000e-004	2.0000e-005	9.9000e-004	0.0000	3.0178	3.0178	8.0000e-005	8.0000e-005	3.0434
Total	1.2400e-003	9.2000e-004	0.0111	3.0000e-005	3.6400e-003	2.0000e-005	3.6700e-003	9.7000e-004	2.0000e-005	9.9000e-004	0.0000	3.0178	3.0178	8.0000e-005	8.0000e-005	3.0434

3.3 Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1132	1.0357	1.1696	1.9400e-003		0.0504	0.0504		0.0474	0.0474	0.0000	166.8994	166.8994	0.0397	0.0000	167.8920
Total	0.1132	1.0357	1.1696	1.9400e-003		0.0504	0.0504		0.0474	0.0474	0.0000	166.8994	166.8994	0.0397	0.0000	167.8920

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.2300e-003	0.2473	0.0820	1.0000e-003	0.0309	1.5600e-003	0.0325	8.9600e-003	1.4900e-003	0.0105	0.0000	95.9591	95.9591	3.7000e-004	0.0140	100.1344
Worker	0.0553	0.0412	0.4950	1.4500e-003	0.1627	9.1000e-004	0.1636	0.0433	8.4000e-004	0.0442	0.0000	134.7145	134.7145	3.3900e-003	3.5600e-003	135.8591
Total	0.0626	0.2885	0.5769	2.4500e-003	0.1936	2.4700e-003	0.1961	0.0523	2.3300e-003	0.0546	0.0000	230.6736	230.6736	3.7600e-003	0.0175	235.9935

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0485	1.0243	1.2869	1.9400e-003		9.7600e-003	9.7600e-003		9.7600e-003	9.7600e-003	0.0000	166.8992	166.8992	0.0397	0.0000	167.8918
Total	0.0485	1.0243	1.2869	1.9400e-003		9.7600e-003	9.7600e-003		9.7600e-003	9.7600e-003	0.0000	166.8992	166.8992	0.0397	0.0000	167.8918

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.2300e-003	0.2473	0.0820	1.0000e-003	0.0309	1.5600e-003	0.0325	8.9600e-003	1.4900e-003	0.0105	0.0000	95.9591	95.9591	3.7000e-004	0.0140	100.1344
Worker	0.0553	0.0412	0.4950	1.4500e-003	0.1627	9.1000e-004	0.1636	0.0433	8.4000e-004	0.0442	0.0000	134.7145	134.7145	3.3900e-003	3.5600e-003	135.8591
Total	0.0626	0.2885	0.5769	2.4500e-003	0.1936	2.4700e-003	0.1961	0.0523	2.3300e-003	0.0546	0.0000	230.6736	230.6736	3.7600e-003	0.0175	235.9935

3.4 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.8800e-003	0.0953	0.1463	2.3000e-004		4.6900e-003	4.6900e-003		4.3100e-003	4.3100e-003	0.0000	20.0265	20.0265	6.4800e-003	0.0000	20.1885
Paving	0.0127					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0226	0.0953	0.1463	2.3000e-004		4.6900e-003	4.6900e-003		4.3100e-003	4.3100e-003	0.0000	20.0265	20.0265	6.4800e-003	0.0000	20.1885

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	6.0000e-005	3.4500e-003	7.1000e-004	1.0000e-005	4.2000e-004	3.0000e-005	4.5000e-004	1.2000e-004	3.0000e-005	1.5000e-004	0.0000	1.4044	1.4044	0.0000	2.2000e-004	1.4702
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.1000e-004	5.1200e-003	2.0000e-005	1.8200e-003	1.0000e-005	1.8300e-003	4.9000e-004	1.0000e-005	4.9000e-004	0.0000	1.4710	1.4710	3.0000e-005	4.0000e-005	1.4828
Total	6.4000e-004	3.8600e-003	5.8300e-003	3.0000e-005	2.2400e-003	4.0000e-005	2.2800e-003	6.1000e-004	4.0000e-005	6.4000e-004	0.0000	2.8754	2.8754	3.0000e-005	2.6000e-004	2.9531

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	5.6100e-003	0.1130	0.1730	2.3000e-004		9.1000e-004	9.1000e-004		9.1000e-004	9.1000e-004	0.0000	20.0265	20.0265	6.4800e-003	0.0000	20.1884
Paving	0.0127					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0183	0.1130	0.1730	2.3000e-004		9.1000e-004	9.1000e-004		9.1000e-004	9.1000e-004	0.0000	20.0265	20.0265	6.4800e-003	0.0000	20.1884

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	6.0000e-005	3.4500e-003	7.1000e-004	1.0000e-005	4.2000e-004	3.0000e-005	4.5000e-004	1.2000e-004	3.0000e-005	1.5000e-004	0.0000	1.4044	1.4044	0.0000	2.2000e-004	1.4702
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.1000e-004	5.1200e-003	2.0000e-005	1.8200e-003	1.0000e-005	1.8300e-003	4.9000e-004	1.0000e-005	4.9000e-004	0.0000	1.4710	1.4710	3.0000e-005	4.0000e-005	1.4828
Total	6.4000e-004	3.8600e-003	5.8300e-003	3.0000e-005	2.2400e-003	4.0000e-005	2.2800e-003	6.1000e-004	4.0000e-005	6.4000e-004	0.0000	2.8754	2.8754	3.0000e-005	2.6000e-004	2.9531

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Burney Hat Creek Sawmill - Shasta County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	0.00	0.00	0.00		
Other Asphalt Surfaces	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Light Industry	14.70	6.60	6.60	59.00	28.00	13.00	92	5	3
Other Asphalt Surfaces	14.70	6.60	6.60	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Light Industry	0.482564	0.053089	0.187461	0.145748	0.045439	0.009405	0.009312	0.022576	0.000645	0.000157	0.035846	0.001434	0.006323
Other Asphalt Surfaces	0.482564	0.053089	0.187461	0.145748	0.045439	0.009405	0.009312	0.022576	0.000645	0.000157	0.035846	0.001434	0.006323

5.0 Energy Detail

Burney Hat Creek Sawmill - Shasta County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Light Industry	2.42e+006	223.9075	0.0362	4.3900e-003	226.1216
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		223.9075	0.0362	4.3900e-003	226.1216

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Light Industry	2.42e+006	223.9075	0.0362	4.3900e-003	226.1216
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		223.9075	0.0362	4.3900e-003	226.1216

6.0 Area Detail

Burney Hat Creek Sawmill - Shasta County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1433	0.0000	2.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.3000e-004	5.3000e-004	0.0000	0.0000	5.7000e-004
Unmitigated	0.1433	0.0000	2.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.3000e-004	5.3000e-004	0.0000	0.0000	5.7000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0379					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.1054					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	3.0000e-005	0.0000	2.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.3000e-004	5.3000e-004	0.0000	0.0000	5.7000e-004
Total	0.1433	0.0000	2.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.3000e-004	5.3000e-004	0.0000	0.0000	5.7000e-004

Burney Hat Creek Sawmill - Shasta County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0379					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.1054					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	3.0000e-005	0.0000	2.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.3000e-004	5.3000e-004	0.0000	0.0000	5.7000e-004
Total	0.1433	0.0000	2.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.3000e-004	5.3000e-004	0.0000	0.0000	5.7000e-004

7.0 Water Detail

7.1 Mitigation Measures Water

Burney Hat Creek Sawmill - Shasta County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	6.1343	0.2450	5.8400e-003	14.0007
Unmitigated	6.1343	0.2450	5.8400e-003	14.0007

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Light Industry	7.5 / 0	6.1343	0.2450	5.8400e-003	14.0007
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		6.1343	0.2450	5.8400e-003	14.0007

Burney Hat Creek Sawmill - Shasta County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Light Industry	7.5 / 0	6.1343	0.2450	5.8400e-003	14.0007
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		6.1343	0.2450	5.8400e-003	14.0007

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	5.0342	0.2975	0.0000	12.4720
Unmitigated	5.0342	0.2975	0.0000	12.4720

Burney Hat Creek Sawmill - Shasta County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Light Industry	24.8	5.0342	0.2975	0.0000	12.4720
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		5.0342	0.2975	0.0000	12.4720

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Light Industry	24.8	5.0342	0.2975	0.0000	12.4720
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		5.0342	0.2975	0.0000	12.4720

9.0 Operational Offroad

Burney Hat Creek Sawmill - Shasta County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
Boiler	1	61.2	214300	25.5	CNG

User Defined Equipment

Equipment Type	Number
----------------	--------

10.1 Stationary Sources

Unmitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	tons/yr										MT/yr					
Boiler - CNG (5 - 75 MMBTU)	0.5778	1.1787	10.2950	0.0630		0.7984	0.7984		0.7984	0.7984	0.0000	11,436.0595	11,436.0595	0.2192	0.0000	11,441.5393
Total	0.5778	1.1787	10.2950	0.0630		0.7984	0.7984		0.7984	0.7984	0.0000	11,436.0595	11,436.0595	0.2192	0.0000	11,441.5393

11.0 Vegetation

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Burney Hat Creek Sawmill

Shasta County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Light Industry	20.00	1000sqft	0.46	20,000.00	0
Other Asphalt Surfaces	9.70	Acre	9.70	422,532.00	0

1.2 Other Project Characteristics

Urbanization	Rural	Wind Speed (m/s)	2.7	Precipitation Freq (Days)	82
Climate Zone	3			Operational Year	2024
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

- Project Characteristics -
- Land Use -
- Construction Phase - Project Description
- Trips and VMT - Project Description
- Grading - Project Description
- Construction Off-road Equipment Mitigation - Basic and Enhanced Emission Reduction Measures
- Water And Wastewater - Applicant Data Response
- Vehicle Trips - Vehicle emissions via EMFAC
- Solid Waste -
- Stationary Sources - Process Boilers -
- Energy Use - Applicant data response

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	3.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	5.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstructionPhase	NumDays	300.00	144.00
tblEnergyUse	LightingElect	2.70	0.00
tblEnergyUse	NT24E	4.16	85.00
tblEnergyUse	NT24NG	3.84	0.00
tblEnergyUse	T24E	1.75	36.00
tblEnergyUse	T24NG	16.86	0.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblStationaryBoilersUse	AnnualHeatInput	0.00	214,300.00
tblStationaryBoilersUse	BoilerRatingValue	0.00	25.50
tblStationaryBoilersUse	DailyHeatInput	0.00	61.20
tblStationaryBoilersUse	NumberOfEquipment	0.00	1.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblVehicleTrips	ST_TR	1.99	0.00
tblVehicleTrips	SU_TR	5.00	0.00
tblVehicleTrips	WD_TR	4.96	0.00
tblWater	IndoorWaterUseRate	4,625,000.00	7,500,000.00

2.0 Emissions Summary

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	3.4198	34.5731	28.9602	0.0645	9.4591	1.4259	10.8849	3.7215	1.3118	5.0333	0.0000	6,303.166 2	6,303.166 2	1.9498	0.2658	6,398.998 9
2024	2.3334	9.8902	15.3257	0.0260	0.2354	0.4727	0.7081	0.0628	0.4350	0.4978	0.0000	2,541.479 4	2,541.479 4	0.7180	0.0282	2,567.833 9
Maximum	3.4198	34.5731	28.9602	0.0645	9.4591	1.4259	10.8849	3.7215	1.3118	5.0333	0.0000	6,303.166 2	6,303.166 2	1.9498	0.2658	6,398.998 9

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	1.6896	30.0357	37.6316	0.0645	3.8449	0.1963	4.0411	1.4927	0.1962	1.6889	0.0000	6,303.166 2	6,303.166 2	1.9498	0.2658	6,398.998 9
2024	1.9062	11.6609	17.9956	0.0260	0.2354	0.0955	0.3309	0.0628	0.0953	0.1582	0.0000	2,541.479 4	2,541.479 4	0.7180	0.0282	2,567.833 9
Maximum	1.9062	30.0357	37.6316	0.0645	3.8449	0.1963	4.0411	1.4927	0.1962	1.6889	0.0000	6,303.166 2	6,303.166 2	1.9498	0.2658	6,398.998 9

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	37.50	6.22	-25.61	0.00	57.91	84.63	62.29	58.90	83.31	66.61	0.00	0.00	0.00	0.00	0.00	0.00

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Stationary	0.3300	0.6732	5.8801	0.0360		0.4560	0.4560		0.4560	0.4560		7,200.1230	7,200.1230	0.1380		7,203.5731
Total	1.1154	0.6732	5.8831	0.0360	0.0000	0.4560	0.4560	0.0000	0.4560	0.4560		7,200.1295	7,200.1295	0.1380	0.0000	7,203.5800

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Stationary	0.3300	0.6732	5.8801	0.0360		0.4560	0.4560		0.4560	0.4560		7,200.1230	7,200.1230	0.1380		7,203.5731
Total	1.1154	0.6732	5.8831	0.0360	0.0000	0.4560	0.4560	0.0000	0.4560	0.4560		7,200.1295	7,200.1295	0.1380	0.0000	7,203.5800

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Grading	Grading	1/1/2023	2/10/2023	5	30	
2	Construction	Building Construction	2/11/2023	8/31/2023	5	144	
3	Paving	Paving	4/6/2024	5/3/2024	5	20	

Acres of Grading (Site Preparation Phase): 0

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Acres of Grading (Grading Phase): 90

Acres of Paving: 9.7

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Construction	Cranes	1	7.00	231	0.29
Construction	Forklifts	3	8.00	89	0.20
Construction	Generator Sets	1	8.00	84	0.74
Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	8	20.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Construction	9	186.00	73.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	50.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Use Cleaner Engines for Construction Equipment

Use DPF for Construction Equipment

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.2036	0.0000	9.2036	3.6538	0.0000	3.6538			0.0000			0.0000
Off-Road	3.3217	34.5156	28.0512	0.0621		1.4245	1.4245		1.3105	1.3105		6,011.4777	6,011.4777	1.9442		6,060.0836
Total	3.3217	34.5156	28.0512	0.0621	9.2036	1.4245	10.6281	3.6538	1.3105	4.9643		6,011.4777	6,011.4777	1.9442		6,060.0836

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0980	0.0575	0.9090	2.4000e-003	0.2555	1.3600e-003	0.2568	0.0678	1.2500e-003	0.0690		245.1803	245.1803	5.5700e-003	5.6100e-003	246.9904
Total	0.0980	0.0575	0.9090	2.4000e-003	0.2555	1.3600e-003	0.2568	0.0678	1.2500e-003	0.0690		245.1803	245.1803	5.5700e-003	5.6100e-003	246.9904

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.5894	0.0000	3.5894	1.4250	0.0000	1.4250			0.0000			0.0000
Off-Road	1.5231	29.9782	36.7226	0.0621		0.1949	0.1949		0.1949	0.1949	0.0000	6,011.4777	6,011.4777	1.9442		6,060.0836
Total	1.5231	29.9782	36.7226	0.0621	3.5894	0.1949	3.7843	1.4250	0.1949	1.6199	0.0000	6,011.4777	6,011.4777	1.9442		6,060.0836

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0980	0.0575	0.9090	2.4000e-003	0.2555	1.3600e-003	0.2568	0.0678	1.2500e-003	0.0690		245.1803	245.1803	5.5700e-003	5.6100e-003	246.9904
Total	0.0980	0.0575	0.9090	2.4000e-003	0.2555	1.3600e-003	0.2568	0.0678	1.2500e-003	0.0690		245.1803	245.1803	5.5700e-003	5.6100e-003	246.9904

3.3 Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1041	3.2718	1.1171	0.0139	0.4476	0.0216	0.4692	0.1289	0.0207	0.1496		1,467.779 3	1,467.779 3	5.7200e- 003	0.2136	1,531.582 0
Worker	0.9116	0.5347	8.4536	0.0223	2.3758	0.0126	2.3884	0.6300	0.0116	0.6417		2,280.177 0	2,280.177 0	0.0518	0.0521	2,297.010 8
Total	1.0157	3.8065	9.5707	0.0362	2.8234	0.0342	2.8576	0.7589	0.0323	0.7912		3,747.956 3	3,747.956 3	0.0576	0.2658	3,828.592 9

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6739	14.2261	17.8738	0.0269		0.1355	0.1355		0.1355	0.1355	0.0000	2,555.209 9	2,555.209 9	0.6079		2,570.406 1
Total	0.6739	14.2261	17.8738	0.0269		0.1355	0.1355		0.1355	0.1355	0.0000	2,555.209 9	2,555.209 9	0.6079		2,570.406 1

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1041	3.2718	1.1171	0.0139	0.4476	0.0216	0.4692	0.1289	0.0207	0.1496		1,467.779 3	1,467.779 3	5.7200e- 003	0.2136	1,531.582 0
Worker	0.9116	0.5347	8.4536	0.0223	2.3758	0.0126	2.3884	0.6300	0.0116	0.6417		2,280.177 0	2,280.177 0	0.0518	0.0521	2,297.010 8
Total	1.0157	3.8065	9.5707	0.0362	2.8234	0.0342	2.8576	0.7589	0.0323	0.7912		3,747.956 3	3,747.956 3	0.0576	0.2658	3,828.592 9

3.4 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.547 2	2,207.547 2	0.7140		2,225.396 3
Paving	1.2707					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	2.2589	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.547 2	2,207.547 2	0.7140		2,225.396 3

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	6.2700e-003	0.3276	0.0708	1.4600e-003	0.0438	3.1700e-003	0.0470	0.0120	3.0300e-003	0.0151		154.7136	154.7136	2.9000e-004	0.0243	161.9672
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0683	0.0381	0.6291	1.7400e-003	0.1916	9.6000e-004	0.1926	0.0508	8.9000e-004	0.0517		179.2186	179.2186	3.7400e-003	3.8900e-003	180.4703
Total	0.0746	0.3657	0.7000	3.2000e-003	0.2354	4.1300e-003	0.2395	0.0628	3.9200e-003	0.0668		333.9322	333.9322	4.0300e-003	0.0282	342.4376

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.5609	11.2952	17.2957	0.0228		0.0914	0.0914		0.0914	0.0914	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	1.2707					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.8316	11.2952	17.2957	0.0228		0.0914	0.0914		0.0914	0.0914	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	6.2700e-003	0.3276	0.0708	1.4600e-003	0.0438	3.1700e-003	0.0470	0.0120	3.0300e-003	0.0151		154.7136	154.7136	2.9000e-004	0.0243	161.9672
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0683	0.0381	0.6291	1.7400e-003	0.1916	9.6000e-004	0.1926	0.0508	8.9000e-004	0.0517		179.2186	179.2186	3.7400e-003	3.8900e-003	180.4703
Total	0.0746	0.3657	0.7000	3.2000e-003	0.2354	4.1300e-003	0.2395	0.0628	3.9200e-003	0.0668		333.9322	333.9322	4.0300e-003	0.0282	342.4376

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	0.00	0.00	0.00		
Other Asphalt Surfaces	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Light Industry	14.70	6.60	6.60	59.00	28.00	13.00	92	5	3
Other Asphalt Surfaces	14.70	6.60	6.60	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Light Industry	0.482564	0.053089	0.187461	0.145748	0.045439	0.009405	0.009312	0.022576	0.000645	0.000157	0.035846	0.001434	0.006323
Other Asphalt Surfaces	0.482564	0.053089	0.187461	0.145748	0.045439	0.009405	0.009312	0.022576	0.000645	0.000157	0.035846	0.001434	0.006323

5.0 Energy Detail

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Natural Gas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Natural Gas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - Natural Gas

Unmitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003
Unmitigated	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2075					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.5777					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.8000e-004	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005			6.5000e-003	6.5000e-003	2.0000e-005	6.9200e-003
Total	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005			6.5000e-003	6.5000e-003	2.0000e-005	6.9200e-003

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2075					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.5777					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.8000e-004	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003
Total	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Burney Hat Creek Sawmill - Shasta County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
Boiler	1	61.2	214300	25.5	CNG

User Defined Equipment

Equipment Type	Number
----------------	--------

10.1 Stationary Sources

Unmitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	lb/day										lb/day					
Boiler - CNG (5 - 75 MMBTU)	0.3300	0.6732	5.8801	0.0360		0.4560	0.4560		0.4560	0.4560		7,200.1230	7,200.1230	0.1380		7,203.5731
Total	0.3300	0.6732	5.8801	0.0360		0.4560	0.4560		0.4560	0.4560		7,200.1230	7,200.1230	0.1380		7,203.5731

11.0 Vegetation

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Burney Hat Creek Sawmill

Shasta County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Light Industry	20.00	1000sqft	0.46	20,000.00	0
Other Asphalt Surfaces	9.70	Acre	9.70	422,532.00	0

1.2 Other Project Characteristics

Urbanization	Rural	Wind Speed (m/s)	2.7	Precipitation Freq (Days)	82
Climate Zone	3			Operational Year	2024
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

- Project Characteristics -
- Land Use -
- Construction Phase - Project Description
- Trips and VMT - Project Description
- Grading - Project Description
- Construction Off-road Equipment Mitigation - Basic and Enhanced Emission Reduction Measures
- Water And Wastewater - Applicant Data Response
- Vehicle Trips - Vehicle emissions via EMFAC
- Solid Waste -
- Stationary Sources - Process Boilers -
- Energy Use - Applicant data response

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	3.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	5.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstructionPhase	NumDays	300.00	144.00
tblEnergyUse	LightingElect	2.70	0.00
tblEnergyUse	NT24E	4.16	85.00
tblEnergyUse	NT24NG	3.84	0.00
tblEnergyUse	T24E	1.75	36.00
tblEnergyUse	T24NG	16.86	0.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblStationaryBoilersUse	AnnualHeatInput	0.00	214,300.00
tblStationaryBoilersUse	BoilerRatingValue	0.00	25.50
tblStationaryBoilersUse	DailyHeatInput	0.00	61.20
tblStationaryBoilersUse	NumberOfEquipment	0.00	1.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblVehicleTrips	ST_TR	1.99	0.00
tblVehicleTrips	SU_TR	5.00	0.00
tblVehicleTrips	WD_TR	4.96	0.00
tblWater	IndoorWaterUseRate	4,625,000.00	7,500,000.00

2.0 Emissions Summary

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	3.4094	34.5841	28.7772	0.0642	9.4591	1.4259	10.8849	3.7215	1.3118	5.0333	0.0000	6,226.8169	6,226.8169	1.9501	0.2730	6,277.4443
2024	2.3261	9.9238	15.2020	0.0258	0.2354	0.4727	0.7081	0.0628	0.4350	0.4978	0.0000	2,519.9426	2,519.9426	0.7182	0.0287	2,546.4532
Maximum	3.4094	34.5841	28.7772	0.0642	9.4591	1.4259	10.8849	3.7215	1.3118	5.0333	0.0000	6,226.8169	6,226.8169	1.9501	0.2730	6,277.4443

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	1.6107	30.0467	37.4486	0.0642	3.8449	0.1963	4.0411	1.4927	0.1962	1.6889	0.0000	6,226.8169	6,226.8169	1.9501	0.2730	6,277.4443
2024	1.8988	11.6945	17.8719	0.0258	0.2354	0.0955	0.3309	0.0628	0.0953	0.1582	0.0000	2,519.9426	2,519.9426	0.7182	0.0287	2,546.4532
Maximum	1.8988	30.0467	37.4486	0.0642	3.8449	0.1963	4.0411	1.4927	0.1962	1.6889	0.0000	6,226.8169	6,226.8169	1.9501	0.2730	6,277.4443

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	38.81	6.22	-25.79	0.00	57.91	84.63	62.29	58.90	83.31	66.61	0.00	0.00	0.00	0.00	0.00	0.00

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Stationary	0.3300	0.6732	5.8801	0.0360		0.4560	0.4560		0.4560	0.4560		7,200.1230	7,200.1230	0.1380		7,203.5731
Total	1.1154	0.6732	5.8831	0.0360	0.0000	0.4560	0.4560	0.0000	0.4560	0.4560		7,200.1295	7,200.1295	0.1380	0.0000	7,203.5800

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Stationary	0.3300	0.6732	5.8801	0.0360		0.4560	0.4560		0.4560	0.4560		7,200.1230	7,200.1230	0.1380		7,203.5731
Total	1.1154	0.6732	5.8831	0.0360	0.0000	0.4560	0.4560	0.0000	0.4560	0.4560		7,200.1295	7,200.1295	0.1380	0.0000	7,203.5800

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Grading	Grading	1/1/2023	2/10/2023	5	30	
2	Construction	Building Construction	2/11/2023	8/31/2023	5	144	
3	Paving	Paving	4/6/2024	5/3/2024	5	20	

Acres of Grading (Site Preparation Phase): 0

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Acres of Grading (Grading Phase): 90

Acres of Paving: 9.7

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Construction	Cranes	1	7.00	231	0.29
Construction	Forklifts	3	8.00	89	0.20
Construction	Generator Sets	1	8.00	84	0.74
Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	8	20.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Construction	9	186.00	73.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	50.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Use Cleaner Engines for Construction Equipment

Use DPF for Construction Equipment

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.2036	0.0000	9.2036	3.6538	0.0000	3.6538			0.0000			0.0000
Off-Road	3.3217	34.5156	28.0512	0.0621		1.4245	1.4245		1.3105	1.3105		6,011.4777	6,011.4777	1.9442		6,060.0836
Total	3.3217	34.5156	28.0512	0.0621	9.2036	1.4245	10.6281	3.6538	1.3105	4.9643		6,011.4777	6,011.4777	1.9442		6,060.0836

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0876	0.0685	0.7261	2.1000e-003	0.2555	1.3600e-003	0.2568	0.0678	1.2500e-003	0.0690		215.3392	215.3392	5.8700e-003	6.2900e-003	217.3607
Total	0.0876	0.0685	0.7261	2.1000e-003	0.2555	1.3600e-003	0.2568	0.0678	1.2500e-003	0.0690		215.3392	215.3392	5.8700e-003	6.2900e-003	217.3607

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.5894	0.0000	3.5894	1.4250	0.0000	1.4250			0.0000			0.0000
Off-Road	1.5231	29.9782	36.7226	0.0621		0.1949	0.1949		0.1949	0.1949	0.0000	6,011.4777	6,011.4777	1.9442		6,060.0836
Total	1.5231	29.9782	36.7226	0.0621	3.5894	0.1949	3.7843	1.4250	0.1949	1.6199	0.0000	6,011.4777	6,011.4777	1.9442		6,060.0836

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0876	0.0685	0.7261	2.1000e-003	0.2555	1.3600e-003	0.2568	0.0678	1.2500e-003	0.0690		215.3392	215.3392	5.8700e-003	6.2900e-003	217.3607
Total	0.0876	0.0685	0.7261	2.1000e-003	0.2555	1.3600e-003	0.2568	0.0678	1.2500e-003	0.0690		215.3392	215.3392	5.8700e-003	6.2900e-003	217.3607

3.3 Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0985	3.5309	1.1647	0.0140	0.4476	0.0217	0.4693	0.1289	0.0208	0.1497		1,470.9856	1,470.9856	5.4900e-003	0.2145	1,535.0349
Worker	0.8149	0.6369	6.7523	0.0196	2.3758	0.0126	2.3884	0.6300	0.0116	0.6417		2,002.6542	2,002.6542	0.0546	0.0585	2,021.4548
Total	0.9133	4.1679	7.9170	0.0335	2.8234	0.0343	2.8577	0.7589	0.0324	0.7913		3,473.6398	3,473.6398	0.0601	0.2730	3,556.4897

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6739	14.2261	17.8738	0.0269		0.1355	0.1355		0.1355	0.1355	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	0.6739	14.2261	17.8738	0.0269		0.1355	0.1355		0.1355	0.1355	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0985	3.5309	1.1647	0.0140	0.4476	0.0217	0.4693	0.1289	0.0208	0.1497		1,470.9856	1,470.9856	5.4900e-003	0.2145	1,535.0349
Worker	0.8149	0.6369	6.7523	0.0196	2.3758	0.0126	2.3884	0.6300	0.0116	0.6417		2,002.6542	2,002.6542	0.0546	0.0585	2,021.4548
Total	0.9133	4.1679	7.9170	0.0335	2.8234	0.0343	2.8577	0.7589	0.0324	0.7913		3,473.6398	3,473.6398	0.0601	0.2730	3,556.4897

3.4 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	1.2707					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	2.2589	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	5.8300e-003	0.3539	0.0723	1.4600e-003	0.0438	3.1700e-003	0.0470	0.0120	3.0400e-003	0.0151		154.9338	154.9338	2.7000e-004	0.0244	162.1974
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0614	0.0454	0.5040	1.5300e-003	0.1916	9.6000e-004	0.1926	0.0508	8.9000e-004	0.0517		157.4616	157.4616	3.9600e-003	4.3600e-003	158.8595
Total	0.0672	0.3992	0.5763	2.9900e-003	0.2354	4.1300e-003	0.2395	0.0628	3.9300e-003	0.0668		312.3954	312.3954	4.2300e-003	0.0287	321.0569

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.5609	11.2952	17.2957	0.0228		0.0914	0.0914		0.0914	0.0914	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	1.2707					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.8316	11.2952	17.2957	0.0228		0.0914	0.0914		0.0914	0.0914	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	5.8300e-003	0.3539	0.0723	1.4600e-003	0.0438	3.1700e-003	0.0470	0.0120	3.0400e-003	0.0151		154.9338	154.9338	2.7000e-004	0.0244	162.1974
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0614	0.0454	0.5040	1.5300e-003	0.1916	9.6000e-004	0.1926	0.0508	8.9000e-004	0.0517		157.4616	157.4616	3.9600e-003	4.3600e-003	158.8595
Total	0.0672	0.3992	0.5763	2.9900e-003	0.2354	4.1300e-003	0.2395	0.0628	3.9300e-003	0.0668		312.3954	312.3954	4.2300e-003	0.0287	321.0569

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	0.00	0.00	0.00		
Other Asphalt Surfaces	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Light Industry	14.70	6.60	6.60	59.00	28.00	13.00	92	5	3
Other Asphalt Surfaces	14.70	6.60	6.60	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Light Industry	0.482564	0.053089	0.187461	0.145748	0.045439	0.009405	0.009312	0.022576	0.000645	0.000157	0.035846	0.001434	0.006323
Other Asphalt Surfaces	0.482564	0.053089	0.187461	0.145748	0.045439	0.009405	0.009312	0.022576	0.000645	0.000157	0.035846	0.001434	0.006323

5.0 Energy Detail

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Natural Gas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Natural Gas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - Natural Gas

Unmitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003
Unmitigated	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2075					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.5777					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.8000e-004	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005			6.5000e-003	6.5000e-003	2.0000e-005	6.9200e-003
Total	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005			6.5000e-003	6.5000e-003	2.0000e-005	6.9200e-003

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2075					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.5777					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.8000e-004	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003
Total	0.7854	3.0000e-005	3.0300e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		6.5000e-003	6.5000e-003	2.0000e-005		6.9200e-003

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Burney Hat Creek Sawmill - Shasta County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
Boiler	1	61.2	214300	25.5	CNG

User Defined Equipment

Equipment Type	Number
----------------	--------

10.1 Stationary Sources

Unmitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	lb/day										lb/day					
Boiler - CNG (5 - 75 MMBTU)	0.3300	0.6732	5.8801	0.0360		0.4560	0.4560		0.4560	0.4560		7,200.1230	7,200.1230	0.1380		7,203.5731
Total	0.3300	0.6732	5.8801	0.0360		0.4560	0.4560		0.4560	0.4560		7,200.1230	7,200.1230	0.1380		7,203.5731

11.0 Vegetation

Attachment B

Operational Emissions

- Summary
- Employees Trips
- Onroad Haul Trucks
- Offroad Onsite
- Sawmill
- Grinder
- Kilns
- Boiler

Operational Employee Vehicle Emissions

Daily VMT	Emission Factor (g/mile)									Daily Emissions (pounds/day)						Annual Emissions (tons/year)						Annual Emissions (metric tons/year)		gal gasoline
	ROG	CO	NOX	CO2	CH4	N2O	PM10	PM2.5	SO2	ROG	CO	NOX	PM10	PM2.5	SO2	ROG	CO	NOX	PM10	PM2.5	SO2	CO2e		
600	0.01	0.97	0.07	306	0.003	0.006	0.02	0.01	0.003	0.02	1.28	0.10	0.02	0.01	0.00	0.00	0.15	0.01	0.00	0.00	0.00	44	4,969	

30 Operational Employees
 10 miles per one way trip

Operational Haul Truck Emissions

	Daily VMT	Emission Factor (g/mile)									Daily Emissions (pounds/day)						Annual Emissions (tons/year)						Annual Emissions (metric tons/year)		
		ROG	CO	NOX	CO2	CH4	N2O	PM10	PM2.5	SO2	ROG	CO	NOX	PM10	PM2.5	SO2	ROG	CO	NOX	PM10	PM2.5	SO2	CO2e	gals Diesel	
Log Truck	2100	0.01	0.03	0.45	1,072	0.000	0.169	0.06	0.02	0.010	0.03	0.16	2.06	0.29	0.12	0.05	0.00	0.02	0.25	0.03	0.01	0.01		563	55,450
By Product Truck	80	0.01	0.03	0.45	1,072	0.000	0.169	0.06	0.02	0.010	0.00	0.01	0.08	0.01	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00		21	2,112
Lumber Truck	1120	0.01	0.03	0.45	1,072	0.000	0.169	0.06	0.02	0.010	0.02	0.08	1.10	0.15	0.06	0.03	0.00	0.01	0.13	0.02	0.01	0.00		300	29,574
											0.05	0.25	3.24	0.45	0.18	0.07	0.01	0.03	0.39	0.05	0.02	0.01		884	87,136

- 15 Log truck trips per day
- 4 By product Truck trip per day
- 4 Lumber Truck trip per day
- 70 miles per one way trip for log truck
- 10 miles per one way for by product truck
- 140 miles per one way for lumber truck

Offroad Operational Equipment Emissions

Equipment	HP	Units	Daily		Load		Emission Factor (g/hp-hour)						Daily Emissions (pounds/day)					Annual Emissions (tons/year)					Annual Emissions (metric tons/year)		gals Diesel	
			Hours	Days	Factor	Year	ROG	CO	NOX	PM10	PM2.5	CO2	CH4	ROG	CO	NOX	PM10	PM2.5	ROG	CO	NOX	PM10	PM2.5	CO2e		
Grinder	950	1	12	240	0.42	2025	0.11	0.75	0.32	0.01	0.01	405	0.003	1.12	7.92	3.36	0.12	0.11	0.13	0.95	0.40	0.01	0.01		465	
Forklift	85	3	12	240	0.20	2025	0.06	0.73	0.55	0.03	0.03	106	0.001	0.08	0.98	0.75	0.04	0.04	0.01	0.12	0.09	0.01	0.00		15.6	1,533
Log Loader	300	2	12	240	0.50	2025	0.11	2.29	0.40	0.02	0.02	403	0.003	0.89	18.2	3.18	0.13	0.12	0.11	2.18	0.38	0.02	0.01		349	34,354
Water Truck	200	1	12	240	0.38	2025	0.14	1.52	1.19	0.08	0.07	202	0.002	0.28	3.06	2.39	0.16	0.14	0.03	0.37	0.29	0.02	0.02		44.3	4,360
Sawmill	60	1	12	240	0.50	2025	0.35	1.78	3.19	0.24	0.22	216	0.002	0.28	1.41	2.53	0.19	0.18	0.03	0.17	0.30	0.02	0.02		18.6	1,837
Total														1.52	23.6	8.85	0.52	0.48	0.18	2.84	1.06	0.06	0.06		427	42,084

Lumber Kiln Drying VOC and HAP Emission Factors						
EPA Region 10 HAP and VOC Emission Factors for Lumber Drying, January 2021 ("x" in equation represents kiln temp in °F)						
Species	VOC (lb/mbf)	Methanol (lb/mbf)	Formaldehyde (lb/mbf)	Acetaldehyde (lb/mbf)	Propionaldehyde (lb/mbf)	Acrolein (lb/mbf)
Ponderosa Pine	0.02083x - 1.30029	0.00137x - 0.18979	0.000074x - 0.010457	0.0340	0.0010	0.0026
White Fir (Eastern True Firs)	0.00817x - 1.02133	0.00465x - 0.73360	0.00016x - 0.02764	0.0550	0.0003	0.0009
Incense Cedar (Western Red Cedar)	0.00817x - 1.02133	0.00465x - 0.73360	0.00016x - 0.02764	0.0677	0.0004	0.0012
Douglas Fir	0.01460x - 1.77130	0.00114x - 0.16090	0.000028x - 0.00380	0.0275	0.0003	0.0005
USDA Effects of Drying Parameters on Hardwood Lumber Drying Defects and VOC Emissions, June 2008						
Oak (Highest of Red and White Oak)	0.3580	--	--	--	--	--

Instructions

NOTE: Only edit cells highlighted in blue. Detailed pollutant emissions tables below will automatically update.

A - Enter lumber processing throughput in units of mbf (thousand board feet) per year - e.g. 18,250,00 board feet -> 18,250 mbf
 B - Enter speciation details for each lumber species. These numbers must add up to 100%
 C - Enter maximum kiln temperature in °F
 D - The average daily VOC emissions are calculated here. If results are greater than Significance Threshold Level A, they will highlight in yellow. If results are greater than Significance Threshold Level B, they will highlight in red.

A. Lumber Processing Parameters	
Annual Throughput (mbf)	25,500

C. Kiln Parameters	
Maximum Drying Temperature (°F)	180

B. Lumber Speciation Parameters		
Species	Distribution	Throughput (mbf)
Ponderosa Pine	60%	15,300
White Fir (Eastern True Firs)	35.0%	8,925
Incense Cedar (Western Red Cedar)	0%	0
Douglas Fir	5%	1,275
Oak (Highest of Red and White Oak)	0.0%	0
Total	100%	25,500

D. Average Daily VOC Emissions (lbs) @ 180 °F	
116.64	
Significance Threshold A	25 lbs/day
Significance Threshold B	137 lbs/day

180 °F - Temperature Specific Emission Factors (lb/mbf)							
Species	VOC	Methanol	Formaldehyde	Acetaldehyde	Propionaldehyde	Acrolein	HAPS
Ponderosa Pine	2.44911	0.05681	0.002863	0.0340	0.0010	0.0026	0.097273
White Fir (Eastern True Firs)	0.44927	0.1034	0.00116	0.0550	0.0003	0.0009	0.16076
Incense Cedar (Western Red Cedar)	0.44927	0.1034	0.00116	0.0677	0.0004	0.0012	0.17386
Douglas Fir	0.8567	0.0443	0.00124	0.0275	0.0003	0.0005	0.07384
Oak (Highest of Red and White Oak)	0.3580	--	--	--	--	--	--

180 °F - Annual Emissions (lbs)							
Species	VOC	Methanol	Formaldehyde	Acetaldehyde	Propionaldehyde	Acrolein	HAPS
Ponderosa Pine	37,471	869	44	520	15	40	1,488
White Fir (Eastern True Firs)	4,010	923	10	491	3	8	1,435
Incense Cedar (Western Red Cedar)	0	0	0	0	0	0	0
Douglas Fir	1,092	56	2	35	0	1	94
Oak (Highest of Red and White Oak)	0	0	0	0	0	0	0
Total	42,573	1,849	56	1,046	18	48	3,017

180 °F - Annual Emissions (tons)							
Species	VOC	Methanol	Formaldehyde	Acetaldehyde	Propionaldehyde	Acrolein	HAPS
Ponderosa Pine	18.74	0.43	0.02	0.26	0.01	0.02	0.74
White Fir (Eastern True Firs)	2.00	0.46	0.01	0.25	0.00	0.00	0.72
Incense Cedar (Western Red Cedar)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Douglas Fir	0.55	0.03	0.00	0.02	0.00	0.00	0.05
Oak (Highest of Red and White Oak)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	21.29	0.92	0.03	0.52	0.01	0.02	1.51

Grinder/Planer Fugitive Dust Emissions

$PM_{10} \text{ (lb/yr)} = \text{Throughput (tons/yr)}(0.024 \text{ lb TSP/ton})(0.60 \text{ lb PM}_{10}\text{/lb TSP})(0.50)$

$PM_{2.5} \text{ (lb/yr)} = \text{Throughput (tons/yr)}(0.024 \text{ lb TSP/ton})(0.25 \text{ lb PM}_{2.5}\text{/lb TSP})(0.50)$

0.32 PM_{10} tons per year 90,000 throughput (tons/year)

0.14 $PM_{2.5}$ tons per year 240 days per year

2.70 PM_{10} pounds per day 375 throughput (tons/day)

1.13 $PM_{2.5}$ pounds per day

To approximate the particulate emissions for wood grinding, the emission factor for "Log Debarking" from a previous edition of AP-42, Approximately 60% of the particulate emissions are assumed to be PM_{10} . Water suppression will also provide 50% abatement of particulate emissions.

Sawmill Emissions

Emission Source	PM	PM10	PM2.5	Daily PM10	Daily PM2.5	Annual PM10	Annual PM2.5		
Sawing (Cyclone with enclosure)	0.125	50	0.0625	30	0.0375 lb/ton log	23.4	14.1	2.81	1.69
"Drop" of "wet" material from one surface to another including, but not limited to, (a) each mechanical conveyance drop between point of generation and storage bin (but not including bin unless open to atmosphere) (b) loadout from storage bin into a truck bed or railcar and (c) drop onto a pile. Apply EF to each "drop."	0.00075		0.00035		0.00005 lb/ton material	0.63	0.09	0.08	0.01
"Drop" of "dry" material from one surface to another including, but not limited to, (a) each mechanical conveyance drop between point of generation and storage bin (but not including bin unless open to atmosphere) (b) loadout from storage bin into a truck bed or railcar and (c) drop onto a pile. Apply EF to each "drop."	0.0015		0.0007		0.0001 lb/ton material	0.13	0.02	0.02	0.00
Pneumatically convey material into target box	0.1	85	0.085	50	0.05 lb/ton material	15.3	9.00	1.84	1.08

Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country, May 8, 2014

The "material" in this entry refers to bark, hogged fuel, green chips, dry chips, green sawdust, dry sawdust, shavings and any other woody by product of lumber production.

- 90,000 tons of logs each year
- 375 tons of logs per day
- 240 days per year
- 12 hours per day
- 43,200 tons of material each year
- 180 tons of material per day

	Daily Emissions (pounds/day)						Annual Emissions (tons/year)						Annual Emissions (metric tons/year)
	ROG	CO	NOx	PM10	PM2.5	SOx	ROG	CO	NOx	PM10	PM2.5	SOx	CO2e
Area Sources	0.79						0.14						
Employees	0.02	1.28	0.10	0.01	0.00	0.00	0.00	0.15	0.01	0.00	0.00	0.00	44
Offroad Onsite	1.52	23.6	8.85	0.52	0.48		0.18	2.84	1.06	0.06	0.06		427
Offsite Haul Trucks	0.05	0.25	3.24	0.45	0.18	0.07	0.01	0.03	0.39	0.05	0.02	0.01	884
Kilns	117						21.3						
Natural Gas Boiler	3.30	58.8	6.60	4.56	4.56	0.36	0.19	3.43	0.39	0.27	0.27	0.02	3,810
Grinder/Planer	1.12	7.92	3.36	2.82	1.24		0.13	0.95	0.40	0.34	0.15		465
Sawmill	0.28	1.41	2.53	46.5	24.3		0.03	0.17	0.30	5.58	2.92		19
Total	124	93.3	24.7	54.8	30.8	0.44	22.0	7.57	2.55	6.30	3.41	0.03	5,650

Significance Thresholds	ROG	NOx	PM10	226 Electrical
Level A	25	25	80	14 Water
Level B	137	137	137	13 Waste
				5,903 Total
Potentially Significant?	ROG	NOx	PM10	
Level A	Yes	No	No	
Level B	No	No	No	

Boiler Emissions

Uncontrolled	EF (lb/10⁶ scf)	MMBtu	Annual Emissions (tons)	Daily Emissions (lbs)	
NOx	100.00	25.5	3.50	60.0	8,400 hours per year (350 day at 24 hours per day)
CO	84.00	25.5	2.94	50.4	24 hours per day
SOx	0.60	25.5	0.02	0.4	33% Average Operating Capacity
PM10/PM2.5	7.60	25.5	0.27	4.6	
CO2	120,000	25.5	4,200	72,000.0	3,810 metric tons
TOC (ROG)	11.00	25.5	0.39	6.6	

Controlled	EF (lb/10⁶ scf)	MMBtu	Annual Emissions (tons)	Daily Emissions (lbs)	
NOx	50.00	25.5	1.75	30.0	8,400 hours per year (350 day at 24 hours per day)
CO	84.00	25.5	2.94	50.4	24 hours per day
SOx	0.60	25.5	0.02	0.36	33% Average Operating Capacity
PM10/PM2.5	7.60	25.5	0.27	4.56	
CO2	120,000	25.5	4,200	72,000	3,810 metric tons
TOC (ROG)	11.00	25.5	0.39	6.60	

BAAQMD	EF (lb/10⁶ scf)	MMBtu	Annual Emissions (tons)	Daily Emissions (lbs)	
NOx	18.72	25.5	0.66	11.2	8,400 hours per year (350 day at 24 hours per day)
CO	84.00	25.5	2.94	50.4	24 hours per day
SOx	0.60	25.5	0.02	0.36	33% Average Operating Capacity
PM10/PM2.5	7.60	25.5	0.27	4.56	
CO2	120,000	25.5	4,200	72,000	3,810 metric tons
TOC (ROG)	5.50	25.5	0.19	3.30	

CALEEMOD	EF (lb/10⁶ scf)	MMBtu	Annual Emissions (tons)	Daily Emissions (lbs)	
NOx	11	25.5	0.39	6.60	8,400 hours per year (350 day at 24 hours per day)
CO	98	25.5	3.43	58.8	24 hours per day
SOx	0.6	25.5	0.02	0.36	33% Average Operating Capacity
PM10/PM2.5	7.6	25.5	0.27	4.56	
CO2	120,000	25.5	4,200	72,000	3,810 metric tons
TOC (ROG)	5.5	25.5	0.19	3.30	

Source:

USEPA AP-42 Section 1.4

BAAQMD Emission Limits 307.2, 307.3, and 307.4 from Section 9-7-307.

Attachment C

Health Risk Assessment Methodology and Assumptions

A health risk assessment (HRA) is accomplished in four steps: 1) hazards identification, 2) exposure assessment, 3) toxicity assessment, and 4) risk characterization. These steps cover the estimation of air emissions, the estimation of the air concentrations resulting from a dispersion analysis, the incorporation of the toxicity of the pollutants emitted, and the characterization of the risk based on exposure parameters such as breathing rate, age adjustment factors, and exposure duration; each depending on receptor type (i.e., residence, school, daycare centers, hospitals, senior care facilities, recreational areas, offsite worker, adult, infant, child).

This HRA was conducted in accordance with technical guidelines developed by federal, state, and regional agencies, including United States Environmental Protection Agency (USEPA) *Guideline on Air Quality Models*¹ and California Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*.² This HRA addresses the emissions from construction and operation of the onsite equipment and steam kilns. A cumulative health impact analysis was also completed for existing operations such as the asphalt processing plant.

An HRA should not be interpreted as the expected rates of cancer or other potential human health effects, but rather as estimates of potential risk or likelihood of adverse effects based on current knowledge, under several highly conservative assumptions and the best assessment tools currently available.

TERMS AND DEFINITIONS

As the practice of conducting an HRA is particularly complex and involves concepts that are not altogether familiar to most people, several terms and definitions are provided that are considered essential to the understanding of the approach, methodology and results:

Acute effect – a health effect (non-cancer) produced within a short period of time (few minutes to several days) following an exposure to toxic air contaminants (TAC).

Cancer risk – the probability of an individual contracting cancer from a lifetime (i.e., 70 year) exposure to TAC such as DPM in the ambient air based on an exposure duration of 30 years.

¹ United States Environmental Protection Agency, *Guideline on Air Quality Models (Revised)*, 40 Code of Federal Regulations, Part 51, Appendix W, November 2005.

² Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

Chronic effect – a health effect (non-cancer) produced from a continuous exposure occurring over an extended period of time (weeks, months, years).

Hazard Index (HI) – the unitless ratio of an exposure level over the acceptable reference dose. The HI can be applied to multiple compounds in an additive manner.

Hazard Quotient (HQ) – the unitless ratio of an exposure level over the acceptable reference dose. The HQ is applied to individual compounds.

Toxic Air Contaminants – any air pollutant that can cause short-term (acute) and/or long-term (chronic or carcinogenic, i.e., cancer causing) adverse human health effects (i.e., injury or illness). The current California list of TAC identify approximately 200 compounds, including particulate emissions from diesel-fueled engines.

Human Health Effects - comprise disorders such as eye watering, respiratory or heart ailments, and other (i.e., non-cancer) related diseases.

Health Risk Assessment – an analysis designed to predict the generation and dispersion of TAC in the outdoor environment, evaluate the potential for exposure of human populations, and to assess and quantify both the individual and population-wide health risks associated with those levels of exposure.

Incremental – under CEQA, the net difference (or change) in conditions or impacts when comparing the baseline to future year project conditions.

Maximum exposed individual (MEI) – an individual assumed to be located at the point where the highest concentrations of TAC, and therefore, health risks are predicted to occur.

Non-cancer risks – health risks such as eye watering, respiratory or heart ailments, and other non-cancer related diseases.

Receptors – the locations where potential health impacts or risks are predicted (i.e., schools, residences, and recreational sites).

LIMITATIONS AND UNCERTAINTIES

There are several important limitations and uncertainties commonly associated with a HRA due to the wide variability of human exposures to TAC, the extended timeframes over which the exposures are evaluated, and the inability to verify the results. Limitations and uncertainties associated with a HRA include: (a.) lack of reliable monitoring data; (b.) extrapolation of toxicity data in animals to humans; (c.) estimation errors in calculating TAC emissions; (d.) concentration prediction errors with dispersion models; and (e.) the variability in lifestyles, fitness and other confounding factors of the human population. This HRA was performed in accordance with USEPA and OEHHA guidance and requirements, notwithstanding the following uncertainties:

- There are uncertainties associated with the estimation of emissions from project activities. Where project-specific data, such as emission factors, are not available, default assumptions in emission models were used.
- The limitations of the air dispersion model provide a source of uncertainty in the estimation of exposure concentrations. According to USEPA, errors due to the limitation of the algorithms implemented in the air dispersion model in the highest estimated concentrations of +/- 10 percent to 40 percent are typical.³
- The source parameters used to model emission sources add uncertainty. For all emission sources, the source parameters used source-specific, recommended as defaults, or expected to produce more conservative results. Discrepancies might exist in actual emissions characteristics of an emission source and its representation in the dispersion model.
- The exposure duration estimates do not consider that people do not usually reside at the same location for 30 years and that other exposures (i.e., school children) are also of much shorter durations than was assumed in this HRA. This exposure duration is a highly conservative assumption since most people do not remain at home all day and on average residents change residences every 11 to 12 years. In addition, this assumption assumes those residents are experiencing outdoor concentrations for the entire exposure period. A school child exposure duration is between ages 2 and 16 years old, which again is conservative because the elementary, middle, and high school are not often located at the same location.
- For the risk and hazards calculations as well as the cumulative health impact, numerous assumptions must be made to estimate human exposure to pollutants. These assumptions

³ United States Environmental Protection Agency, *Guideline on Air Quality Models (Revised)*, 40 Code of Federal Regulations, Part 51, Appendix W, November 2005.

include parameters such as breathing rates, exposure time and frequency, exposure duration, and human activity patterns. While a mean value derived from scientifically defensible studies is the best estimate of central tendency, most of the exposure variables used in this HRA are high-end estimates. The combination of several high-end estimates used as exposure parameters may substantially overestimate pollutant intake. The excess lifetime cancer risks calculated in this HRA are therefore likely to be higher than may be required to be protective of public health.

- The OEHHA cancer potency factor for DPM was used to estimate cancer risks associated with exposure to DPM emissions from construction and operational equipment activities (as was also done for other air toxics). However, the cancer potency factor derived by OEHHA for DPM is highly uncertain in both the estimation of response and dose. In the past, due to inadequate animal test data and epidemiology data on diesel exhaust, the International Agency for Research on Cancer (IARC), a branch of the World Health Organization, had classified DPM as Probably Carcinogenic to Humans (Group 2); the USEPA had also concluded that the existing data did not provide an adequate basis for quantitative risk assessment.⁴ However, based on two recent scientific studies,⁵ IARC recently re-classified DPM as Carcinogenic to Humans to Group 1,⁶ which means that the agency has determined that there is “sufficient evidence of carcinogenicity” of a substance in humans and represents the strongest weight-of-evidence rating in IARC’s carcinogen classification scheme. This determination by the IARC may provide additional impetus for the USEPA to identify a quantitative dose-response relationship between exposure to DPM and cancer.

In summary, the estimated health impacts are based primarily on a series of conservative assumptions related to predicted environmental concentrations, exposure, and chemical toxicity. The use of conservative assumptions tends to produce upper-bound estimates of risk. The USEPA notes that the conservative assumptions used in a HRA are intended to assure that the estimated risks do not underestimate the actual risks posed by a site and that the estimated risks do not necessarily represent actual risks experienced by populations at or near a site.⁷

⁴ United States Environmental Protection Agency, *Health Assessment Document for Diesel Engine Exhaust*, May 2002, https://cfpub.epa.gov/si/si_public_record_report.cfm?dirEntryId=29060

⁵ Attfield MD, Schleiff PL, Lubin JH, Blair A, Stewart PA, Vermeulen R, Coble JB, Silverman DT, *The Diesel Exhaust in Miners Study: A Nested Case-Control Study of Lung Cancer and Diesel Exhaust*, June 2012, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3369553/>

⁶ International Agency for Research on Cancer, *Diesel Engine Exhaust Carcinogenic*, June 2012, https://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf

⁷ United States Environmental Protection Agency, *Risk Assessment Guidance for Superfund Human Health Risk Assessment*, December 1989, https://www.epa.gov/sites/production/files/2015-09/documents/rags_a.pdf

HAZARDS IDENTIFICATION

Diesel emissions occur during construction activities and the result of operation of onsite equipment such as loaders, the grinder and sawmill engines, and haul trucks. Diesel exhaust is a complex mixture of numerous individual gaseous and particulate compounds emitted from diesel-fueled combustion engines. Diesel particulate matter is formed primarily through the incomplete combustion of diesel fuel. DPM is removed from the atmosphere through physical processes including atmospheric fall-out and washout by rain. Humans can be exposed to airborne DPM by deposition on water, soil, and vegetation; although the main pathway of exposure is inhalation. Cal/EPA has concluded that potential cancer risk from inhalation exposure to whole diesel exhaust outweigh the multi-pathway cancer risk from the speciated components.

In August 1998, the CARB identified DPM as an air toxic. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel- Fueled Engines and Vehicles* and *Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines* and approved these documents on September 28, 2000.^{8,9} The documents represent proposals to reduce DPM emissions, with the goal of reducing emissions and the associated health risk by requiring the use of state-of-the-art catalyzed DPM filters and ultra-low-sulfur diesel fuel.

In 2001, CARB assessed the state-wide health risks from exposure to diesel exhaust and to other toxic air contaminants. It is difficult to distinguish the health risks of diesel emissions from those of other air toxics since diesel exhaust contains approximately 40 different TAC. The CARB study detected diesel exhaust by using ambient air carbon soot measurements as a surrogate for diesel emissions. The study reported that the state-wide cancer risk from exposure to diesel exhaust was about 540 per million population as compared to a total risk for exposure to all ambient air toxics of 760 per million. This estimate, which accounts for about 70 percent of the total risk from TAC, included both urban and rural areas in the state. The estimate can also be considered an average worst-case for the state, since it assumes constant exposure to outdoor concentrations of diesel exhaust and does not account for expected lower concentrations indoors, where most of time is spent. DPM is estimated to increase statewide cancer risk by 520 cancers per million residents exposed over a lifetime.¹⁰

Exposure to DPM results in a greater incidence of chronic non-cancer health effects, such as cough, labored breathing, chest tightness, wheezing, and bronchitis. Individuals particularly vulnerable to DPM

⁸ California Air Resources Board, *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*, October 2000, <http://www.arb.ca.gov/diesel/documents/rrpfinal.pdf>

⁹ California Air Resources Board, *Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*, October 2000.

¹⁰ California Air Resources Board, *Summary: Diesel Particulate Matter Health Impacts*, April 12, 2016, https://www.arb.ca.gov/research/diesel/diesel-health_summ.htm

are children, whose lung tissue is still developing, the elderly and people with illnesses who may have other serious health problems that can be aggravated by exposure to DPM. In general, children are more vulnerable than adults to air pollutants because they have higher inhalation rates, narrower airways, and less mature immune systems. In addition, children with allergies may have an enhanced allergic response when exposed to diesel exhaust.

Lastly, the operations of the steam kilns would result in emissions of air toxics such as formaldehyde, arsenic cadmium, and acetaldehyde.

EXPOSURE ASSESSMENT

Dispersion is the process by which atmospheric pollutants disseminate due to wind and vertical stability. The results of a dispersion analysis are used to assess pollutant concentrations at or near an emission source. The results of an analysis allow predicted concentrations of pollutants to be compared directly to air quality standards and other criteria such as health risks based on modeled concentrations.

A rising pollutant plume reacts with the environment in several ways before it levels off. First, the plume's own turbulence interacts with atmospheric turbulence to entrain ambient air. This mixing process reduces and eventually eliminates the density and momentum differences that cause the plume to rise. Second, the wind transports the plume during its rise and entrainment process. Higher winds mix the plume more rapidly, resulting in a lower final rise. Third, the plume interacts with the vertical temperature stratification of the atmosphere, rising as a result of buoyancy in the unstable-to-neutrally stratified mixed layer. However, after the plume encounters the mixing lid and the stably stratified air above, its vertical motion is dampened.

Molecules of gas or small particles injected into the atmosphere will separate from each other as they are acted on by turbulent eddies. The Gaussian mathematical model such as AERMOD simulates the dispersion of the gas or particles within the atmosphere. The formulation of the Gaussian model is based on the following assumptions:

- The predictions are not time-dependent (all conditions remain unchanged with time)
- The wind speed and direction are uniform, both horizontally and vertically, throughout the region of concern
- The rate of diffusion is not a function of position
- Diffusion in the direction of the transporting wind is negligible when compared to the transport flow

Dispersion Modeling Approach

Air dispersion modeling was performed to estimate the downwind dispersion of air toxics from the construction and operation of the steam kilns. The following sections present the fundamental components of an air dispersion modeling analysis including air dispersion model selection and options, receptor locations, meteorological data, building downwash, and source exhaust parameters.

Model Selection and Options

AERMOD (Version 22112)¹¹ was used for the dispersion analysis. AERMOD is the USEPA preferred atmospheric dispersion modeling system for general industrial sources. The model can simulate point, area, volume, and line sources. AERMOD is the appropriate model for this analysis based on the coverage of simple, intermediate, and complex terrain. It also predicts both short-term and long-term (annual) average concentrations. The model was executed using the regulatory default options (stack-tip downwash, buoyancy-induced dispersion, and final plume rise), default wind speed profile categories, default potential temperature gradients, and assuming no pollutant decay.

The selection of the appropriate dispersion coefficients depends on the land use within three kilometers (km) of the project site. The types of land use were based on the classification method defined by Auer (1978); using pertinent United States Geological Survey (USGS) 1:24,000 scale (7.5 minute) topographic maps of the area. If the Auer land use types of heavy industrial, light-to-moderate industrial, commercial, and compact residential account for 50 percent or more of the total area, the USEPA *Guideline on Air Quality Models*¹² recommends using urban dispersion coefficients; otherwise, the appropriate rural coefficients can be used. Based on observation of the area surrounding the project site, rural (urban is only designated within dense city centers such as downtown Redding) dispersion coefficients were applied within AERMOD.

Receptor Locations

Some receptors are considered more sensitive to air pollutants than others, because of preexisting health problems, proximity to the emissions source, or duration of exposure to air pollutants. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general

¹¹ United States Environmental Protection Agency, AERMOD Modeling System, <https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models>

¹² United States Environmental Protection Agency, *Guideline on Air Quality Models (Revised)*, 40 Code of Federal Regulations, Part 51, Appendix W, November 2005.

public. Residential areas are also considered sensitive to poor air quality because people in residential areas are often at home for extended periods. Recreational land uses are moderately sensitive to air pollution because vigorous exercise associated with recreation places having a high demand on respiratory system function.

Sensitive receptors were placed at receptors to estimate health impacts due to proposed project construction and operation on existing residences. **Figure C-1** displays the location of the sensitive receptors (i.e., residences, school, and offsite workers) used in this HRA. Receptors were placed at a height of 1.8 meters (typical breathing height). Terrain elevations for receptor locations were used based on available USGS information for the area.

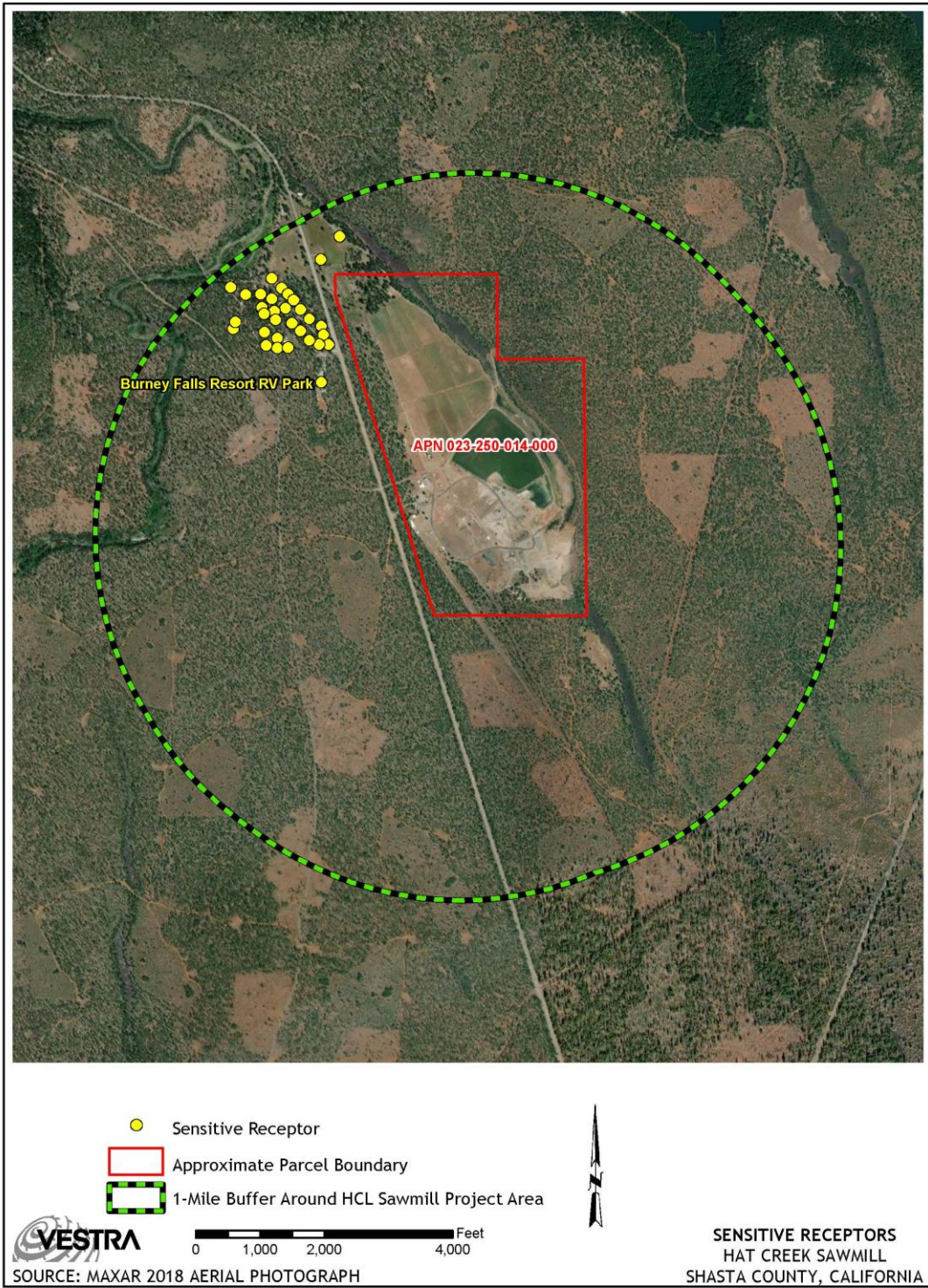
Meteorological Data

Air quality is a function of both the rate and location of pollutant emissions under the influence of meteorological conditions and topographic features affecting pollutant movement and dispersal. Atmospheric conditions such as wind speed, wind direction, atmospheric stability, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants, and consequently affect air quality.

Hourly meteorological data from Redding Municipal Airport, located approximately 50 miles to the southwest of the proposed project, were used in the dispersion modeling analysis. Meteorological data from 2017 through 2021 were used.¹³ **Figure C-2** displays the annual wind rose. Wind directions are predominantly from the south and north with a low frequency of calm wind speed conditions (approximately 1.4 percent), as shown in **Figure C-3**. The average annual wind speed is 6.7 miles per hour (3.0 meters per second).

¹³ California Air Resources Board, Hotspots Analysis and Reporting Program Meteorological Files, October 5, 2015, <https://www.arb.ca.gov/toxics/harp/metfiles2.htm>

Figure C-1
Health Risk Assessment Receptors



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Figure C-2
Windrose for Redding Municipal Airport

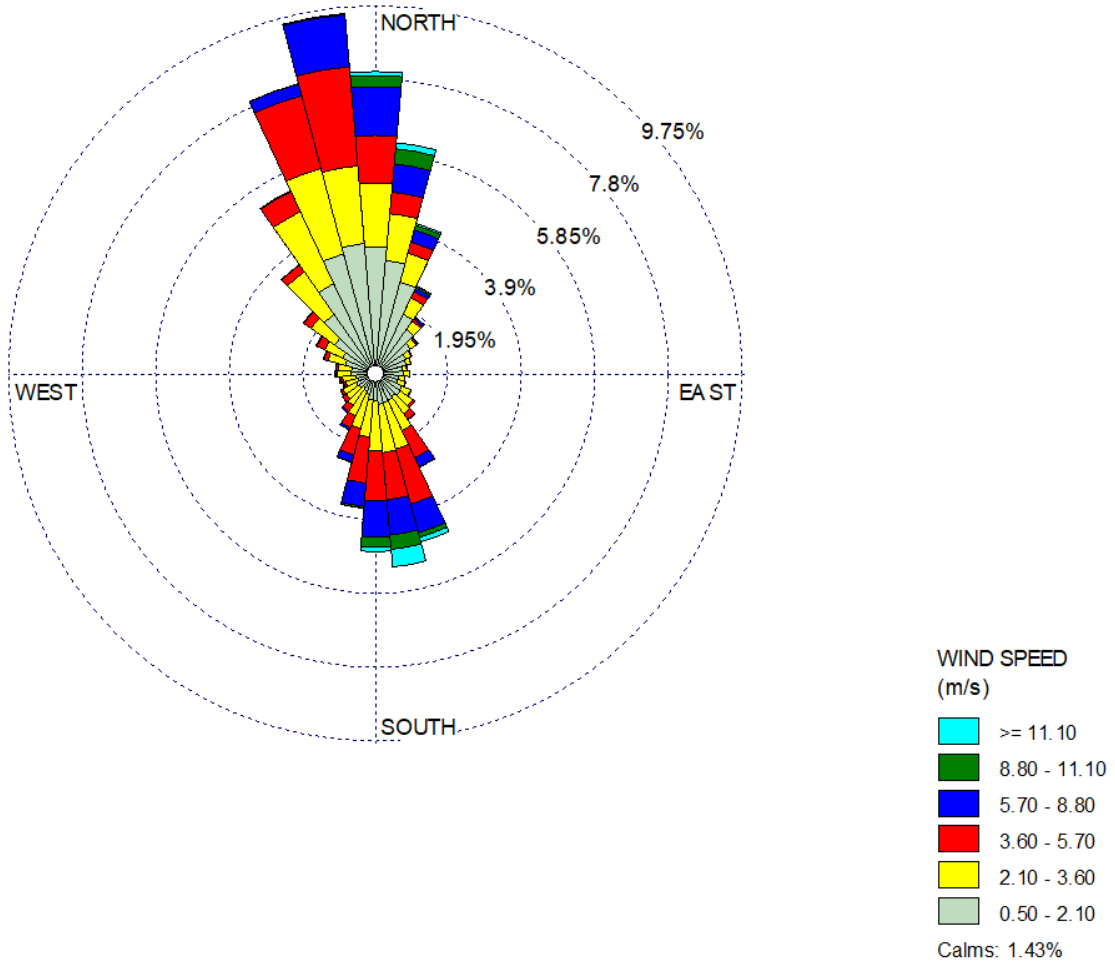
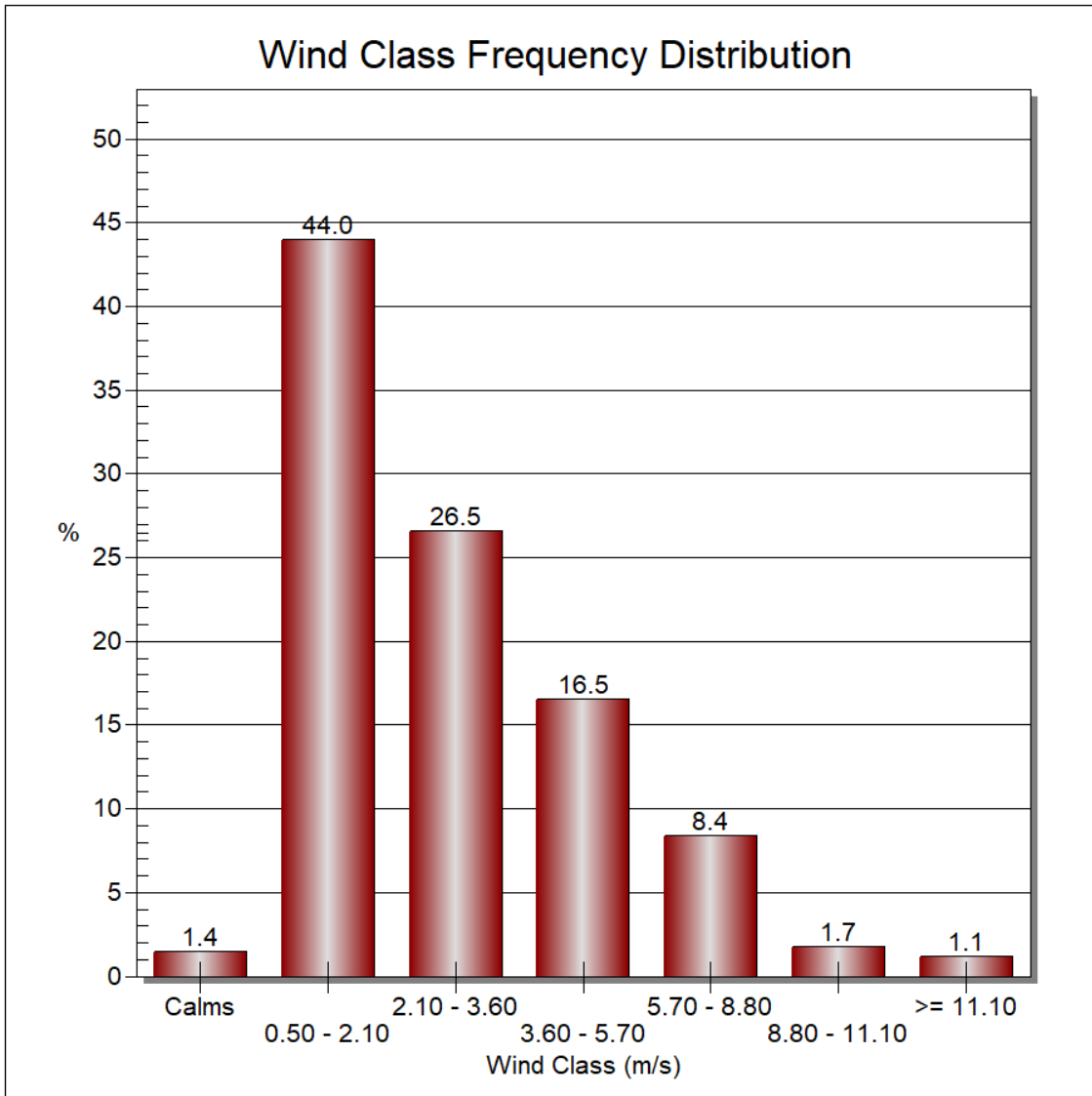


Figure C-3
Wind Speed Distribution for Redding Municipal Airport



Source Release Characteristics

Construction and operational equipment activities were treated as an area source. The release height of the off-road equipment exhaust was 5.0 meters (16.4 feet) and an initial vertical dimension of 1.4 meters (4.6 feet), which reflects the height of the equipment plus an additional height of the exhaust plume above the exhaust point to account for plume rise due to buoyancy and momentum. Haul trucks were treated as a line source (i.e., volume sources placed at regular intervals) located along an access road. The haul trucks were assigned a release height of 5.0 meters (16.4 feet) and an initial vertical dimension of 1.4 meters (4.6 feet), which accounts for dispersion from the movement of vehicles.^{14 15} Typical construction activities would occur between 8:00 a.m. to 5:00 p.m. Monday through Friday. If Saturday work is required, construction activities would occur between 10:00 a.m. to 5:00 p.m. Operational equipment was assumed to operate ten hours per day; seven days per week.

Once construction is completed the sawmill operations would occur at the project site from 7:00 a.m. to 6:00 p.m. on Monday through Saturday. The sawmill operations are expected to begin in August of 2023. The sawmill would operate for 240 days of the year (12 hours per day) while the two drying kilns and associated natural gas boiler would operate 350 days per year (24 hours per day).

Table C-1 provides the estimated emission source release characteristics for the steam kilns.

Table C-1
Point Source Release Characteristics

Emission Source	Stack Height (ft)	Stack Diameter (ft)	Exit Temperature (F)	Exit Velocity (ft/s)
Steam Kiln (each vent)	18	2.63	180	18.4

The kiln building has a gable-style sloped roof top which runs lengthwise. The peak of the roof is 21 feet. The vents are spaced along each of the roof halves at a height of 18 feet. Each roof half has eight vents in a line, 10 feet from the center, for a total of sixteen vents. Only eight vents exhaust during operation and are dependent on kiln circulation air fan direction. The steam kiln vents have a square dimension of 28 inches by 28 inches (with an equivalent diameter of 2.63 feet). The total steam kilns exhaust flow rate is 48,000 cubic feet per minute; therefore, each of the eight vents would have an exhaust flow rate of 6,000 cubic feet per minute.

¹⁴ While haul truck emissions contribute substantially to overall project emissions, they are spread over many miles. Hence, the portion of trucking emissions that would impact one receptor is much smaller than the emissions that the clustered off-road activity at the project site would impact a receptor near the site. For example, the DPM emissions from truck travel within 1,000 feet of the project are less than 1 percent of the total off-road DPM emissions.

¹⁵ South Coast Air Quality Management District, Final Localized Significance Threshold Methodology. July 2008, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-1st-methodology-document.pdf?sfvrsn=2>

Table C-2 displays the estimate air toxics emission rates for the steam kilns. For the kilns, air toxics emission factors within *USEPA’s Region 10 HAP and VOC Emission Factors for Lumber Drying*¹⁶ were used. The expected species of wood to be processed are 60 percent of ponderosa pine, 35 percent of white fir, and 5 percent of Douglass fir.

**Table C-2
Air Toxics Emission Rates (pounds/hour)**

Compound	Dry Kiln
Acetaldehyde	8.49E-02
Acrolein	4.83E-03
Formaldehyde	9.06E-03
Methyl alcohol	2.22E-01
Propionaldehyde	1.83E-03

Building Downwash

Building downwash is the influence building structures have on the wind flow and thus influence the emissions from point sources such as generators and fume hoods. The AERMOD required input of building heights and projected building widths for 36 wind directions. The USEPA Building Profile Input Program was used to determine the direction-specific building dimensions. Building downwash algorithms incorporated into AERMOD account for the plume dispersion effects of the aerodynamic wakes and eddies produced by buildings and structures. The Plume Rise Model Enhancements (PRIME) model was used to determine the direction-specific building downwash parameters. PRIME calculates fields of turbulence intensity, wind speed, and slopes of the mean streamlines as a function of projected building shape. Using a numerical plume rise model, PRIME determines the change in plume centerline location and the rate of plume dispersion with downwind distance. Concentrations are predicted in both the near and far wake regions, with the plume mass captured by the near wake treated separately from the uncaptured primary plume and re-emitted to the far wake as a volume source.

The kiln buildings are 90 feet by 60 feet by 21 feet (length, width, and height). The kiln building is situated in an east-west orientation. **Figure C-4** displays the project site layout including the location of the proposed kilns.

¹⁶ United States Environmental Protection Agency, Region 10 HAP and VOC Emission Factors for Lumber Drying, January 2021, <https://www.epa.gov/system/files/documents/2021-07/epa-region-10-lumber-drying-ef-january-2021.pdf>

**Figure C-4
Project Site Layout**



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EXPOSURE PARAMETERS

Exposure to airborne chemicals occurs through inhalation and subsequent absorption into the body, potentially resulting in adverse health effects depending on toxicological properties of the chemical and other exposure parameters. This HRA was conducted in accordance with technical guidelines developed by federal, state, and regional agencies, including USEPA, California Environmental Protection Agency (CalEPA), OEHHA *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*.¹⁷ This was accomplished by applying the estimated concentrations at the receptors analyzed to the established cancer risk estimates and acceptable reference concentrations for non-cancer health effects.

OEHHA's revisions to its *Guidance Manual* were primarily designed to ensure that the greater sensitivity of children to cancer and other health risks is reflected in HRAs. For example, OEHHA now recommends that risks be analyzed separately for multiple age groups, focusing especially on young children and teenagers, rather than the past practice of analyzing risks to the general population, without distinction by age. OEHHA also now recommends that statistical "age sensitivity factors" be incorporated into a HRA, and that children's relatively high breathing rates be accounted for. On the other hand, the *Guidance Manual* revisions also include some changes that would reduce calculated health risks. For example, under the former guidance, OEHHA recommended that residential cancer risks be assessed by assuming 70 years of exposure at a residential receptor; under the *Guidance Manual*, this assumption is lessened to 30 years. This is based on studies showing that 30 years is a reasonable estimate of the 90th to 95th percentile of residency duration in the population. Therefore, the HRA provides that a receptor's exposure to a project's emissions for up to 30 years and that the cancer risk is then determined based on a 70-year lifetime for that receptor.

Scientific data have shown that young animals are more sensitive than adult animals to exposure to many carcinogens. Therefore, OEHHA developed age sensitivity factors (ASF) to consider the increased sensitivity to carcinogens during early-in-life exposures. OEHHA recommends that cancer risks be weighted by a factor of 10 for exposures that occur from the third trimester of pregnancy to 2 years of age, by a factor of 3 for exposures from 2 years through 16 years of age, and by a factor of 1 for exposures from 16 years through 30 years of age.

OEHHA has developed exposure factors (e.g., daily breathing rates) for four age groups including the third trimester to birth, birth to 2 years, 2 to 16 years, and 16 to 30 years. These age bins allow for more refined exposure information to be used when estimating exposure and the potential for developing cancer over a lifetime. This means that exposure variates are needed for the third trimester, ages zero

¹⁷ Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html.

to less than two, ages two to than 16, and ages 16 to 30. Residential receptors utilize the 95th percentile breathing rate values. The age-specific breathing rates for the four age groups are 361 liters per kilogram-day for third trimester, 1,060 liters per kilogram-day for ages less than 2 years, 745 liters per kilogram-day for ages 2 to 16 years, and 335 liters per kilogram-day for ages 16 to 30 years. A school child (age 2 to 9 years) breathing rate is 631 liters per kilogram-day and an offsite worker breathing rate is 230 liters per kilogram-day.¹⁸

Based on OEHHA recommendations, the cancer risk to residential receptors assumes exposure occurs 24 hours per day for 350 days per year while accounting for a percentage of time at home. OEHHA evaluated information from activity pattern databases to estimate the fraction of time at home (FAH) during the day.

This information is used to adjust cancer risk from a project's emissions, assuming that exposure to the project's emissions is not occurring away from home. A FAH factor of 1.0 applies for the offsite workers since the offsite worker is assumed to be present for a typical eight-hour workday which would correspond to the project construction and operation schedule. In general, the FAH factors are age-specific and are 0.85 for ages less than 2 years, 0.72 for ages 2 to 16 years, and 0.73 for ages 16 to 30 years.

Based on OEHHA recommendations, for children at school sites, exposure is assumed to occur 10 hours per day for 180 days (or 36 weeks) per year. Cancer risk estimates for children at school sites are calculated based on nine-year exposure duration. School sites also include teachers and other adult staff which are treated as offsite workers. For occupational receptors, OEHA guidance suggests that the exposure be based on 8 hours per day, 5 days per week, 250 working days per year, and a 25-year working lifetime. This is a conservative assumption since most people do not remain at the same job for 25 years. For offsite worker exposures, it is assumed that the working age begins at 16 years, and that exposures to project emissions occur during the work shift which is typically up to eight hours per day during workdays. Given the exposure durations of less than 24 hours, sensitive recreational receptors were evaluated for acute impacts only.¹⁹ **Table C-3** presents a summary of the health risk assessment exposure factors.

¹⁸ Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html.

¹⁹ Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html.

**Table C-3
Health Risk Assessment Exposure Factors**

Receptor	Age	Age Specific Factor	Breathing Rate (L/kg-day)	Fraction of Time	Daily Exposure	Annual Exposure
Worker	16 to 41	1	230	1	8 hours	250 days
Residential	Third Trimester	10	361	0.85	24 hours	350 days
	0 to 2	10	1,090	0.85	24 hours	350 days
	2 to 16	3	745	0.72	24 hours	350 days
	16 to 30	1	335	0.73	24 hours	350 days
School Child	2 to 16	3	581	1	10 hours	180 days

Source: Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, March 6, 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html

RISK CHARACTERIZATION

Cancer risk is defined as the lifetime probability of developing cancer from exposure to carcinogenic substances. Cancer risks are expressed as the chance in one million of getting cancer (i.e., number of cancer cases among one million people exposed). The cancer risks are assumed to occur exclusively through the inhalation pathway. The cancer risk can be estimated by using the cancer potency factor (milligrams per kilogram of body weight per day [mg/kg-day]), the 70-year annual average concentration (microgram per cubic meter [$\mu\text{g}/\text{m}^3$]), and the lifetime exposure adjustment based on a 30-year exposure duration.

Following guidelines established by OEHHA, the incremental cancer risks attributable to the proposed project were calculated by applying exposure parameters to modeled DPM concentrations in order to determine the inhalation dose (mg/kg-day) or the amount of pollutants inhaled per body weight mass per day. The cancer risks occur exclusively through the inhalation pathway; therefore, the cancer risks can be estimated from the following equation:

$$\text{Dose-inh} = \frac{C_{\text{air}} * \{\text{DBR}\} * A * \text{ASF} * \text{FAH} * \text{EF} * \text{ED} * 10^{-6}}{\text{AT}}$$

AT

where:

Dose-inh = Dose of the toxic substance through inhalation in mg/kg-day

10^{-6} = Micrograms to milligrams conversion, Liters to cubic meters conversion

C_{air} = Concentration in air in microgram (μg)/cubic meter (m^3)

DBR = Daily breathing rate in liter (L)/kg body weight – day

A	= Inhalation absorption factor, 1.0
ASF	= Age Sensitivity Factor
EF	= Exposure frequency (days/year)
ED	= Exposure duration (years)
FAH	= Fraction of Time at Home
AT	= Averaging time period over which exposure is averaged in days (25,550 days for a 70-year lifetime based on a 30-year exposure duration)

To determine incremental cancer risk, the estimated inhalation dose attributed to the proposed project was multiplied by the cancer potency slope factor (cancer risk per mg/kg-day). The cancer potency slope factor is the upper bound on the increased cancer risk from a lifetime exposure to a pollutant. These slope factors are based on epidemiological studies and are different values for different pollutants. This allows the estimated inhalation dose to be equated to a cancer risk.

Non-cancer adverse health impacts, acute (short-term) and chronic (long-term), are measured against a hazard index (HI), which is defined as the ratio of the predicted incremental exposure concentration from the proposed project to a published reference exposure level (REL) that could cause adverse health effects as established by OEHHA. The ratio (referred to as the Hazard Quotient [HQ]) of each non-carcinogenic substance that affects a certain organ system is added to produce an overall HI for that organ system. The overall HI is calculated for each organ system. If the overall HI for the highest-impacted organ system is greater than one, then the impact is significant.

The HI is an expression used for the potential for non-cancer health effects. The relationship for the non-cancer health effects is given by the annual concentration (in $\mu\text{g}/\text{m}^3$) and the REL (in $\mu\text{g}/\text{m}^3$). The acute hazard index was determined using the “simple” concurrent maximum approach, which tends to be conservative (i.e., overpredicts).

The relationship for the non-cancer health effects is given by the following equation:

$$\text{HI} = \text{C}/\text{REL}$$

Where:

HI = Hazard index; an expression of the potential for non-cancer health effects.

C = Annual average concentration ($\mu\text{g}/\text{m}^3$) during the 70-year exposure period.

REL = Concentration at which no adverse health effects are anticipated.

The concentration level at or below which no adverse non-cancer health effects are anticipated for a specified exposure duration is termed the REL. REL are based on the most sensitive, relevant, adverse health effect reported in the medical and toxicological literature. REL are designed to protect the most sensitive individuals in the population by the inclusion of margins of safety. Since margins of safety are incorporated to address data gaps and uncertainties, exceeding the REL does not automatically indicate an adverse health impact.²⁰

Table C-4 displays the toxicity values for the pollutants of concern associated with the proposed project construction (diesel particulate matter), onsite equipment (diesel particulate matter), and steam kilns (other air toxics) operations.

Table C-4
Health Risk Assessment Toxicity Values

Compound	Inhalation Slope Factor ($\text{mg}/\text{kg}\text{-day}$) ¹	Acute REL ($\mu\text{g}/\text{m}^3$)	Chronic REL ($\mu\text{g}/\text{m}^3$)
DPM	1.1	-	5
Acetaldehyde	0.01	470	140
Acrolein	-	2.5	0.35
Formaldehyde	0.021	55	9
Methyl alcohol	-	28,000	4,000

Source: Office of Environmental Health Hazards Assessment - -- *Chemical Database*, <https://oehha.ca.gov/chemicals>

A brief description of the pollutants of concern is provided within the following:

Acetaldehyde

Acetaldehyde is a colorless, volatile liquid with a characteristic pungent, fruity odor. Acetaldehyde is used primarily as a chemical intermediate in the production of acetic acid and as a synthetic flavoring agent. Acetaldehyde is released to the environment in vehicle exhaust and as a product of open burning of gas, fuel oil, and coal. Acute exposure to acetaldehyde can cause eye, nose, and throat irritation and subsequent inflammation of the eyes and coughing.²¹

20 Office of Environmental Health Hazards Assessment - Consolidated Health Values Table, October 2, 2020, <https://www.arb.ca.gov/toxics/healthval/contable.pdf>

21 National Center for Biotechnology Information, <https://pubchem.ncbi.nlm.nih.gov/compound/Acetaldehyde>

Acrolein

Acrolein is a clear or yellow liquid with a disagreeable odor. Acrolein is used as an intermediate in the production of acrylic acid, as well as a pesticide to control algae, weeds, bacteria, and mollusks. Small amounts of acrolein can be formed and emitted into the air when trees, tobacco, other plants, gasoline, and oil are burned. Acrolein may also be released into the environment in emissions and effluents from manufacturing and use facilities and in emissions from combustion. Exposure to high concentrations of acrolein may damage the lungs and could cause death. Breathing lower amounts may cause watery eyes, burning of the nose and throat, and decreased breathing rate.²²

Formaldehyde

At room temperature, formaldehyde is a colorless, flammable gas with a distinct, pungent smell. Formaldehyde is a product of incomplete combustion and is emitted into the air by burning wood, coal, kerosene, and natural gas, by automobiles, and by cigarettes; it is also a naturally occurring substance. Formaldehyde can be released to soil, water, and air by industrial sources and can off-gas from materials made with it. Humans can be exposed to formaldehyde through inhalation of contaminated air and smog. Low levels of formaldehyde can cause irritation of the eyes, nose, throat, and skin. Some epidemiological studies found an increased incidence of nose and throat cancer in exposed individuals, but other studies could not confirm this finding.²³

Methyl Alcohol

Methyl alcohol, or methanol, is a colorless, flammable liquid used to manufacture formaldehyde and acetic acid, in chemical synthesis, in antifreeze, and as a solvent. Methanol is released to the environment during industrial use and naturally from volcanic gases, vegetation, and microbes. Acute (short-term) or chronic (long-term) exposure of humans to methanol by inhalation or ingestions may result in blurred vision, headache, dizziness, and nausea. Methyl Alcohol is used as a solvent and as an intermediate in chemical synthesis.²⁴

²² Agency for Toxic Substance and Disease Registry ToxFAQ for Acrolein, <https://www.atsdr.cdc.gov/substances/indexAZ.asp>

²³ Agency for Toxic Substance and Disease Registry ToxFAQ for Formaldehyde, <https://www.atsdr.cdc.gov/substances/indexAZ.asp>

²⁴ United States Environmental Protection Agency, Hazard Summary for Methanol, <https://www.epa.gov/sites/production/files/2016-09/documents/methanol.pdf>

The following provide the health risk assessment results for the following conditions:

- Construction Activities
- Operational Equipment
- Grinder Engine
- Sawmill Engine
- Steam Kilns

Health Risk Assessment Assumptions

5 Chronic Reference Exposure Level (ug/m3) for DPM	
1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350 days per year	
25,550 days per lifetime	
1,090 95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
745 95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335 95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
0.85 fraction of time at home	0<2 Years
0.72 fraction of time at home	2<16 Years
0.73 fraction of time at home	16<70 Years

Project: Burney Hat Creek Sawmill
 Date: 4/5/2023
 Condition: Unmitigated
 Receptor: Existing Residence
 Condition: Construction

Exposure Year	Calendar Year	Annual DPM Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk	
1	2023	1.04E-02	1,090	10.0	0.85	1.45	
2	2024	8.16E-05	1,090	10.0	0.85	0.01	
3	2025		745	4.75	0.72		
4	2026		745	3.00	0.72		
5	2027		745	3.00	0.72		
6	2028		745	3.00	0.72		
7	2029		745	3.00	0.72		
8	2030		745	3.00	0.72		
9	2031		745	3.00	0.72		
10	2032		745	3.00	0.72		
11	2033		745	3.00	0.72		
12	2034		745	3.00	0.72		
13	2035		745	3.00	0.72		
14	2036		745	3.00	0.72		
15	2037		745	3.00	0.72		
16	2038		745	3.00	0.72		
17	2039		335	1.70	0.73		
18	2040		335	1.00	0.73		
19	2041		335	1.00	0.73		
20	2042		335	1.00	0.73		
21	2043		335	1.00	0.73		
22	2044		335	1.00	0.73		
23	2045		335	1.00	0.73		
24	2046		335	1.00	0.73		
25	2047		335	1.00	0.73		
26	2048		335	1.00	0.73		
27	2049		335	1.00	0.73		
28	2050		335	1.00	0.73		
29	2051		335	1.00	0.73		
30	2052		335	1.00	0.73		

0.00 Chronic Hazard Impact
 1 Significance Threshold
 No Significant?

1.46 Cancer Risk
 10 Significance Threshold
 No Significant?

Health Risk Assessment Assumptions

5 Chronic Reference Exposure Level (ug/m3) for DPM	
1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350 days per year	
25,550 days per lifetime	
1,090 95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
745 95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335 95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
0.85 fraction of time at home	0<2 Years
0.72 fraction of time at home	2<16 Years
0.73 fraction of time at home	16<70 Years

Project: Burney Hat Creek Sawmill
 Date: 4/5/2023
 Condition: Mitigated
 Receptor: Existing Residence
 Condition: Construction

Exposure Year	Calendar Year	Annual DPM Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk
1	2023	2.25E-03	1,090	10.0	0.85	0.31
2	2024	1.78E-05	1,090	10.0	0.85	0.00
3	2025		745	4.75	0.72	
4	2026		745	3.00	0.72	
5	2027		745	3.00	0.72	
6	2028		745	3.00	0.72	
7	2029		745	3.00	0.72	
8	2030		745	3.00	0.72	
9	2031		745	3.00	0.72	
10	2032		745	3.00	0.72	
11	2033		745	3.00	0.72	
12	2034		745	3.00	0.72	
13	2035		745	3.00	0.72	
14	2036		745	3.00	0.72	
15	2037		745	3.00	0.72	
16	2038		745	3.00	0.72	
17	2039		335	1.70	0.73	
18	2040		335	1.00	0.73	
19	2041		335	1.00	0.73	
20	2042		335	1.00	0.73	
21	2043		335	1.00	0.73	
22	2044		335	1.00	0.73	
23	2045		335	1.00	0.73	
24	2046		335	1.00	0.73	
25	2047		335	1.00	0.73	
26	2048		335	1.00	0.73	
27	2049		335	1.00	0.73	
28	2050		335	1.00	0.73	
29	2051		335	1.00	0.73	
30	2052		335	1.00	0.73	

0.00 Chronic Hazard Impact
 1 Significance Threshold
 No Significant?

0.32 Cancer Risk
 10 Significance Threshold
 No Significant?

Health Risk Assessment Assumptions

5 Chronic Reference Exposure Level (ug/m3) for DPM	
1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350 days per year	
25,550 days per lifetime	
1,090 95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
745 95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335 95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
0.85 fraction of time at home	0<2 Years
0.72 fraction of time at home	2<16 Years
0.73 fraction of time at home	16<70 Years

Project: Burney Hat Creek Sawmill
 Date: 4/5/2023

Receptor: Existing Residence
 Conditon: Operation Equipment

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk	
1	2023	0.00	1,090	10.0	0.85	0.15	
2	2024	0.00	1,090	10.0	0.85	0.15	
3	2025	0.00	745	4.75	0.72	0.04	
4	2026	0.00	745	3.00	0.72	0.03	0.00 Chronic Hazard Impact
5	2027	0.00	745	3.00	0.72	0.03	1 Significance Threshold
6	2028	0.00	745	3.00	0.72	0.03	No Significant?
7	2029	0.00	745	3.00	0.72	0.03	
8	2030	0.00	745	3.00	0.72	0.03	0.50 Cancer Risk
9	2031	0.00	745	3.00	0.72	0.03	10 Significance Threshold
10	2032	0.00	745	3.00	0.72	0.03	No Significant?
11	2033	0.00	745	3.00	0.72	0.03	
12	2034	0.00	745	3.00	0.72	0.03	
13	2035	0.00	745	3.00	0.72	0.03	
14	2036	0.00	745	3.00	0.72	0.03	
15	2037	0.00	745	3.00	0.72	0.03	
16	2038	0.00	745	3.00	0.72	0.03	
17	2039	0.00	335	1.70	0.73	0.01	
18	2040	0.00	335	1.00	0.73	0.00	
19	2041	0.00	335	1.00	0.73	0.00	
20	2042	0.00	335	1.00	0.73	0.00	
21	2043	0.00	335	1.00	0.73	0.00	
22	2044	0.00	335	1.00	0.73	0.00	
23	2045	0.00	335	1.00	0.73	0.00	
24	2046	0.00	335	1.00	0.73	0.00	
25	2047	0.00	335	1.00	0.73	0.00	
26	2048	0.00	335	1.00	0.73	0.00	
27	2049	0.00	335	1.00	0.73	0.00	
28	2050	0.00	335	1.00	0.73	0.00	
29	2051	0.00	335	1.00	0.73	0.00	
30	2052	0.00	335	1.00	0.73	0.00	

Health Risk Assessment Assumptions

5 Chronic Reference Exposure Level (ug/m3) for DPM	
1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350 days per year	
25,550 days per lifetime	
1,090 95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
745 95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335 95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
0.85 fraction of time at home	0<2 Years
0.72 fraction of time at home	2<16 Years
0.73 fraction of time at home	16<70 Years

Project: Burney Hat Creek Sawmill
 Date: 4/2/2023

Receptor: Existing Residence
 Conditon: Grinder Engine

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk	
1	2023	0.00	1,090	10.0	0.85	0.06	
2	2024	0.00	1,090	10.0	0.85	0.06	
3	2025	0.00	745	4.75	0.72	0.02	
4	2026	0.00	745	3.00	0.72	0.01	0.00 Chronic Hazard Impact
5	2027	0.00	745	3.00	0.72	0.01	1 Significance Threshold
6	2028	0.00	745	3.00	0.72	0.01	No Significant?
7	2029	0.00	745	3.00	0.72	0.01	
8	2030	0.00	745	3.00	0.72	0.01	0.20 Cancer Risk
9	2031	0.00	745	3.00	0.72	0.01	10 Significance Threshold
10	2032	0.00	745	3.00	0.72	0.01	No Significant?
11	2033	0.00	745	3.00	0.72	0.01	
12	2034	0.00	745	3.00	0.72	0.01	
13	2035	0.00	745	3.00	0.72	0.01	
14	2036	0.00	745	3.00	0.72	0.01	
15	2037	0.00	745	3.00	0.72	0.01	
16	2038	0.00	745	3.00	0.72	0.01	
17	2039	0.00	335	1.70	0.73	0.00	
18	2040	0.00	335	1.00	0.73	0.00	
19	2041	0.00	335	1.00	0.73	0.00	
20	2042	0.00	335	1.00	0.73	0.00	
21	2043	0.00	335	1.00	0.73	0.00	
22	2044	0.00	335	1.00	0.73	0.00	
23	2045	0.00	335	1.00	0.73	0.00	
24	2046	0.00	335	1.00	0.73	0.00	
25	2047	0.00	335	1.00	0.73	0.00	
26	2048	0.00	335	1.00	0.73	0.00	
27	2049	0.00	335	1.00	0.73	0.00	
28	2050	0.00	335	1.00	0.73	0.00	
29	2051	0.00	335	1.00	0.73	0.00	
30	2052	0.00	335	1.00	0.73	0.00	

Health Risk Assessment Assumptions

5 Chronic Reference Exposure Level (ug/m3) for DPM	
1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM	
350 days per year	
25,550 days per lifetime	
1,090 95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
745 95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335 95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
0.85 fraction of time at home	0<2 Years
0.72 fraction of time at home	2<16 Years
0.73 fraction of time at home	16<70 Years

Project: Burney Hat Creek Sawmill
 Date: 4/2/2023

Receptor: Existing Residence
 Conditon: Sawmill Engine

Exposure Year	Calender Year	Annual DPM Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk	
1	2023	0.00	1,090	10.0	0.85	0.09	
2	2024	0.00	1,090	10.0	0.85	0.09	
3	2025	0.00	745	4.75	0.72	0.03	
4	2026	0.00	745	3.00	0.72	0.02	0.00 Chronic Hazard Impact
5	2027	0.00	745	3.00	0.72	0.02	1 Significance Threshold
6	2028	0.00	745	3.00	0.72	0.02	No Significant?
7	2029	0.00	745	3.00	0.72	0.02	
8	2030	0.00	745	3.00	0.72	0.02	0.31 Cancer Risk
9	2031	0.00	745	3.00	0.72	0.02	10 Significance Threshold
10	2032	0.00	745	3.00	0.72	0.02	No Significant?
11	2033	0.00	745	3.00	0.72	0.02	
12	2034	0.00	745	3.00	0.72	0.02	
13	2035	0.00	745	3.00	0.72	0.02	
14	2036	0.00	745	3.00	0.72	0.02	
15	2037	0.00	745	3.00	0.72	0.02	
16	2038	0.00	745	3.00	0.72	0.02	
17	2039	0.00	335	1.70	0.73	0.00	
18	2040	0.00	335	1.00	0.73	0.00	
19	2041	0.00	335	1.00	0.73	0.00	
20	2042	0.00	335	1.00	0.73	0.00	
21	2043	0.00	335	1.00	0.73	0.00	
22	2044	0.00	335	1.00	0.73	0.00	
23	2045	0.00	335	1.00	0.73	0.00	
24	2046	0.00	335	1.00	0.73	0.00	
25	2047	0.00	335	1.00	0.73	0.00	
26	2048	0.00	335	1.00	0.73	0.00	
27	2049	0.00	335	1.00	0.73	0.00	
28	2050	0.00	335	1.00	0.73	0.00	
29	2051	0.00	335	1.00	0.73	0.00	
30	2052	0.00	335	1.00	0.73	0.00	

Health Risk Assessment Assumptions

470 Acute Reference Exposure Level (ug/m3)	
140 Chronic Reference Exposure Level (ug/m3)	
0.01 Cancer Potency Slope Factor (cancer risk per mg/kg-day)	
350 days per year	
25,550 days per lifetime	
1,090 95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
745 95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335 95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
0.85 fraction of time at home	0<2 Years
0.72 fraction of time at home	2<16 Years
0.73 fraction of time at home	16<70 Years

Project: Burney Hat Creek Sawmill
 Date: April 2, 2023
 Condition: Acetaldehyde
 Receptor: Residence
 Source: Kiln

Exposure Year	Calender Year	1-Hour Concentration (ug/m3)	Annual Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk	
1	2025	0.69	0.01	1,090	10.0	0.85	0.01	0.00 Acute Hazard Impact
2	2026	0.69	0.01	1,090	10.0	0.85	0.01	1 Significance Threshold
3	2027	0.69	0.01	745	4.75	0.72	0.00	No Significant?
4	2028	0.69	0.01	745	3.00	0.72	0.00	0.00 Chronic Hazard Impact
5	2029	0.69	0.01	745	3.00	0.72	0.00	1 Significance Threshold
6	2030	0.69	0.01	745	3.00	0.72	0.00	No Significant?
7	2031	0.69	0.01	745	3.00	0.72	0.00	
8	2032	0.69	0.01	745	3.00	0.72	0.00	0.04 Cancer Risk
9	2033	0.69	0.01	745	3.00	0.72	0.00	10 Significance Threshold
10	2034	0.69	0.01	745	3.00	0.72	0.00	No Significant?
11	2035	0.69	0.01	745	3.00	0.72	0.00	
12	2036	0.69	0.01	745	3.00	0.72	0.00	
13	2037	0.69	0.01	745	3.00	0.72	0.00	
14	2038	0.69	0.01	745	3.00	0.72	0.00	
15	2039	0.69	0.01	745	3.00	0.72	0.00	
16	2040	0.69	0.01	745	3.00	0.72	0.00	
17	2041	0.69	0.01	335	1.70	0.73	0.00	
18	2042	0.69	0.01	335	1.00	0.73	0.00	
19	2043	0.69	0.01	335	1.00	0.73	0.00	
20	2044	0.69	0.01	335	1.00	0.73	0.00	
21	2045	0.69	0.01	335	1.00	0.73	0.00	
22	2046	0.69	0.01	335	1.00	0.73	0.00	
23	2047	0.69	0.01	335	1.00	0.73	0.00	
24	2048	0.69	0.01	335	1.00	0.73	0.00	
25	2049	0.69	0.01	335	1.00	0.73	0.00	
26	2050	0.69	0.01	335	1.00	0.73	0.00	
27	2051	0.69	0.01	335	1.00	0.73	0.00	
28	2052	0.69	0.01	335	1.00	0.73	0.00	
29	2053	0.69	0.01	335	1.00	0.73	0.00	
30	2054	0.69	0.01	335	1.00	0.73	0.00	

Health Risk Assessment Assumptions

2.5 Acute Reference Exposure Level (ug/m3)	
0.35 Chronic Reference Exposure Level (ug/m3)	
Cancer Potency Slope Factor (cancer risk per mg/kg-day)	
350 days per year	
25,550 days per lifetime	
1,090 95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
745 95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335 95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
0.85 fraction of time at home	0<2 Years
0.72 fraction of time at home	2<16 Years
0.73 fraction of time at home	16<70 Years

Project: Burney Hat Creek Sawmill
 Date: April 2, 2023
 Condition: Acrolein
 Receptor: Residence
 Source: Kiln

Exposure Year	Calendar Year	1-Hour Concentration (ug/m3)	Annual Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk	
1	2025	0.03	0.00	1,090	10.0	0.85	-	0.01 Acute Hazard Impact
2	2026	0.03	0.00	1,090	10.0	0.85	-	1 Significance Threshold
3	2027	0.03	0.00	745	4.75	0.72	-	No Significant?
4	2028	0.03	0.00	745	3.00	0.72	-	0.00 Chronic Hazard Impact
5	2029	0.03	0.00	745	3.00	0.72	-	1 Significance Threshold
6	2030	0.03	0.00	745	3.00	0.72	-	No Significant?
7	2031	0.03	0.00	745	3.00	0.72	-	
8	2032	0.03	0.00	745	3.00	0.72	-	- Cancer Risk
9	2033	0.03	0.00	745	3.00	0.72	-	10 Significance Threshold
10	2034	0.03	0.00	745	3.00	0.72	-	No Significant?
11	2035	0.03	0.00	745	3.00	0.72	-	
12	2036	0.03	0.00	745	3.00	0.72	-	
13	2037	0.03	0.00	745	3.00	0.72	-	
14	2038	0.03	0.00	745	3.00	0.72	-	
15	2039	0.03	0.00	745	3.00	0.72	-	
16	2040	0.03	0.00	745	3.00	0.72	-	
17	2041	0.03	0.00	335	1.70	0.73	-	
18	2042	0.03	0.00	335	1.00	0.73	-	
19	2043	0.03	0.00	335	1.00	0.73	-	
20	2044	0.03	0.00	335	1.00	0.73	-	
21	2045	0.03	0.00	335	1.00	0.73	-	
22	2046	0.03	0.00	335	1.00	0.73	-	
23	2047	0.03	0.00	335	1.00	0.73	-	
24	2048	0.03	0.00	335	1.00	0.73	-	
25	2049	0.03	0.00	335	1.00	0.73	-	
26	2050	0.03	0.00	335	1.00	0.73	-	
27	2051	0.03	0.00	335	1.00	0.73	-	
28	2052	0.03	0.00	335	1.00	0.73	-	
29	2053	0.03	0.00	335	1.00	0.73	-	
30	2054	0.03	0.00	335	1.00	0.73	-	

Health Risk Assessment Assumptions

55 Acute Reference Exposure Level (ug/m3)	
9 Chronic Reference Exposure Level (ug/m3)	
0.021 Cancer Potency Slope Factor (cancer risk per mg/kg-day)	
350 days per year	
25,550 days per lifetime	
1,090 95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
745 95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335 95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
0.85 fraction of time at home	0<2 Years
0.72 fraction of time at home	2<16 Years
0.73 fraction of time at home	16<70 Years

Project: Burney Hat Creek Sawmill
 Date: April 2, 2023
 Condition: Formaldehyde
 Receptor: Residence
 Source: Kiln

Exposure Year	Calender Year	1-Hour Concentration (ug/m3)	Annual Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk	
1	2025	0.04	0.00	1,090	10.0	0.85	0.00	0.00 Acute Hazard Impact
2	2026	0.04	0.00	1,090	10.0	0.85	0.00	1 Significance Threshold
3	2027	0.04	0.00	745	4.75	0.72	0.00	No Significant?
4	2028	0.04	0.00	745	3.00	0.72	0.00	0.00 Chronic Hazard Impact
5	2029	0.04	0.00	745	3.00	0.72	0.00	1 Significance Threshold
6	2030	0.04	0.00	745	3.00	0.72	0.00	No Significant?
7	2031	0.04	0.00	745	3.00	0.72	0.00	
8	2032	0.04	0.00	745	3.00	0.72	0.00	0.00 Cancer Risk
9	2033	0.04	0.00	745	3.00	0.72	0.00	10 Significance Threshold
10	2034	0.04	0.00	745	3.00	0.72	0.00	No Significant?
11	2035	0.04	0.00	745	3.00	0.72	0.00	
12	2036	0.04	0.00	745	3.00	0.72	0.00	
13	2037	0.04	0.00	745	3.00	0.72	0.00	
14	2038	0.04	0.00	745	3.00	0.72	0.00	
15	2039	0.04	0.00	745	3.00	0.72	0.00	
16	2040	0.04	0.00	745	3.00	0.72	0.00	
17	2041	0.04	0.00	335	1.70	0.73	0.00	
18	2042	0.04	0.00	335	1.00	0.73	0.00	
19	2043	0.04	0.00	335	1.00	0.73	0.00	
20	2044	0.04	0.00	335	1.00	0.73	0.00	
21	2045	0.04	0.00	335	1.00	0.73	0.00	
22	2046	0.04	0.00	335	1.00	0.73	0.00	
23	2047	0.04	0.00	335	1.00	0.73	0.00	
24	2048	0.04	0.00	335	1.00	0.73	0.00	
25	2049	0.04	0.00	335	1.00	0.73	0.00	
26	2050	0.04	0.00	335	1.00	0.73	0.00	
27	2051	0.04	0.00	335	1.00	0.73	0.00	
28	2052	0.04	0.00	335	1.00	0.73	0.00	
29	2053	0.04	0.00	335	1.00	0.73	0.00	
30	2054	0.04	0.00	335	1.00	0.73	0.00	

Health Risk Assessment Assumptions

28,000	Acute Reference Exposure Level (ug/m3)	
4,000	Chronic Reference Exposure Level (ug/m3)	
	Cancer Potency Slope Factor (cancer risk per mg/kg-day)	
350	days per year	
25,550	days per lifetime	
1,090	95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
745	95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335	95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
0.85	fraction of time at home	0<2 Years
0.72	fraction of time at home	2<16 Years
0.73	fraction of time at home	16<70 Years

Project: Burney Hat Creek Sawmill
 Date: April 2, 2023
 Condition: Methyl alcohol
 Receptor: Residence
 Source: Kiln

Exposure Year	Calender Year	1-Hour Concentration (ug/m3)	Annual Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk	
1	2025	1.23	0.01	1,090	10.0	0.85	-	0.00 Acute Hazard Impact
2	2026	1.23	0.01	1,090	10.0	0.85	-	1 Significance Threshold
3	2027	1.23	0.01	745	4.75	0.72	-	No Significant?
4	2028	1.23	0.01	745	3.00	0.72	-	0.00 Chronic Hazard Impact
5	2029	1.23	0.01	745	3.00	0.72	-	1 Significance Threshold
6	2030	1.23	0.01	745	3.00	0.72	-	No Significant?
7	2031	1.23	0.01	745	3.00	0.72	-	- Cancer Risk
8	2032	1.23	0.01	745	3.00	0.72	-	10 Significance Threshold
9	2033	1.23	0.01	745	3.00	0.72	-	No Significant?
10	2034	1.23	0.01	745	3.00	0.72	-	
11	2035	1.23	0.01	745	3.00	0.72	-	
12	2036	1.23	0.01	745	3.00	0.72	-	
13	2037	1.23	0.01	745	3.00	0.72	-	
14	2038	1.23	0.01	745	3.00	0.72	-	
15	2039	1.23	0.01	745	3.00	0.72	-	
16	2040	1.23	0.01	745	3.00	0.72	-	
17	2041	1.23	0.01	335	1.70	0.73	-	
18	2042	1.23	0.01	335	1.00	0.73	-	
19	2043	1.23	0.01	335	1.00	0.73	-	
20	2044	1.23	0.01	335	1.00	0.73	-	
21	2045	1.23	0.01	335	1.00	0.73	-	
22	2046	1.23	0.01	335	1.00	0.73	-	
23	2047	1.23	0.01	335	1.00	0.73	-	
24	2048	1.23	0.01	335	1.00	0.73	-	
25	2049	1.23	0.01	335	1.00	0.73	-	
26	2050	1.23	0.01	335	1.00	0.73	-	
27	2051	1.23	0.01	335	1.00	0.73	-	
28	2052	1.23	0.01	335	1.00	0.73	-	
29	2053	1.23	0.01	335	1.00	0.73	-	
30	2054	1.23	0.01	335	1.00	0.73	-	

Health Risk Assessment Assumptions

Acute Reference Exposure Level (ug/m3)	
Chronic Reference Exposure Level (ug/m3)	
Cancer Potency Slope Factor (cancer risk per mg/kg-day)	
350 days per year	
25,550 days per lifetime	
1,090 95th Percentile Daily Breathing Rates (L/kg-day)	0<2 Years
745 95th Percentile Daily Breathing Rates (L/kg-day)	2<16 Years
335 95th Percentile Daily Breathing Rates (L/kg-day)	16<30 Years
0.85 fraction of time at home	0<2 Years
0.72 fraction of time at home	2<16 Years
0.73 fraction of time at home	16<70 Years

Project: Burney Hat Creek Sawmill
 Date: April 2, 2023
 Condition: Propionaldehyde
 Receptor: Residence
 Source: Kiln

Exposure Year	Calender Year	1-Hour Concentration (ug/m3)	Annual Concentration (ug/m3)	Daily Breathing Rates (L/kg-day)	Exposure Factor	fraction of time at home	Cancer Risk	Acute Hazard Impact
1	2025	0.01	0.00	1,090	10.0	0.85	-	1 Significance Threshold
2	2026	0.01	0.00	1,090	10.0	0.85	-	No Significant?
3	2027	0.01	0.00	745	4.75	0.72	-	
4	2028	0.01	0.00	745	3.00	0.72	-	Chronic Hazard Impact
5	2029	0.01	0.00	745	3.00	0.72	-	1 Significance Threshold
6	2030	0.01	0.00	745	3.00	0.72	-	No Significant?
7	2031	0.01	0.00	745	3.00	0.72	-	
8	2032	0.01	0.00	745	3.00	0.72	-	- Cancer Risk
9	2033	0.01	0.00	745	3.00	0.72	-	10 Significance Threshold
10	2034	0.01	0.00	745	3.00	0.72	-	No Significant?
11	2035	0.01	0.00	745	3.00	0.72	-	
12	2036	0.01	0.00	745	3.00	0.72	-	
13	2037	0.01	0.00	745	3.00	0.72	-	
14	2038	0.01	0.00	745	3.00	0.72	-	
15	2039	0.01	0.00	745	3.00	0.72	-	
16	2040	0.01	0.00	745	3.00	0.72	-	
17	2041	0.01	0.00	335	1.70	0.73	-	
18	2042	0.01	0.00	335	1.00	0.73	-	
19	2043	0.01	0.00	335	1.00	0.73	-	
20	2044	0.01	0.00	335	1.00	0.73	-	
21	2045	0.01	0.00	335	1.00	0.73	-	
22	2046	0.01	0.00	335	1.00	0.73	-	
23	2047	0.01	0.00	335	1.00	0.73	-	
24	2048	0.01	0.00	335	1.00	0.73	-	
25	2049	0.01	0.00	335	1.00	0.73	-	
26	2050	0.01	0.00	335	1.00	0.73	-	
27	2051	0.01	0.00	335	1.00	0.73	-	
28	2052	0.01	0.00	335	1.00	0.73	-	
29	2053	0.01	0.00	335	1.00	0.73	-	
30	2054	0.01	0.00	335	1.00	0.73	-	