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Air Quality Impact Assessments (AQIA)
Assembly Bill 32 (AB32)
California Air Resource Board (CARB)
California Ambient Air Quality Standards (CAAAQS)
California Environmental Quality Act (CEQA)
Carbon Dioxide (CO₂)
Cubic Yards (CY)
Diesel Particulate Matter (DPM)
Environmental Protection Agency (EPA)
EPA Office of Air Quality Planning and Standards (OAQPS)
Hazardous Air Pollutants (HAPs)
Hydrogen Sulfide (H₂S)
International Residential Code (IRC)
Level of Service (LOS)
Low Carbon Fuel Standard (LCFS)
Methane (CH₄)
National ambient air quality standards (NAAQS)
Nitrous Oxide (N₂O)
Reactive Organic Gas (ROG)
Regional Air Quality Strategy (RAQS)
San Diego Air Basin (SDAB)
San Diego Air Pollution Control District (SDAPCD)
South Coast Air Quality Management District (SCAQMD)
Specific Plan Area (SPA)
State Implementation Plan (SIP)
Toxic Air Contaminants (TACs)
Vehicle Miles Traveled (VMT)
Volatile Organic Compounds (VOC)
EXECUTIVE SUMMARY

This air quality analysis has been completed to determine air quality impacts, which may be associated with the construction of the proposed chicken manure processing project. The project site is generally located within the unincorporated town of Ramona within the County of San Diego. The site is currently occupied by an existing “Egg Ranch” with capacity by right to operate with up to 3 million chickens, which would generate as much as 1,125 tons of manure per week. Currently, manure is collected and held onsite then loaded into trucks and transported offsite. With the implementation of the proposed project, a manure processing facility would be developed on-site to dry and process manure by removing moisture and compress dried manure into pellets. These manure pellets would then be sold and transported offsite. The drying process will occur within a 16,200 square foot (SF) indoor facility which will have a filtered ventilation system installed.

The proposed project would consist of a manure drying system and palletization system. The proposed process for manure drying and creating pellets would be powered using three (3) 145 Kilowatt (kW) electric motors.

All construction phases of the proposed project are anticipated to start in 2021 and be completed later that year. The first full year of operations would be expected in 2022. The project was found to have significant health risk impacts from diesel exhaust during construction without the use of at least Tier 3 or better diesel equipment fitted with diesel particulate filters (DPF). As described herein, the project would be required to implement T-BACT which would consist of Tier 4 engines. However, this analysis conservatively assumes only the use of Tier 3 equipment. This conservative analysis demonstrates that the project’s impacts would remain below this threshold should the contractor not be able to provide Tier 4/T-BACT for every piece of equipment used during construction. Given this, a less than significant health risk impact is expected.

Based upon the analysis of construction activities, no criteria pollutant impacts would be expected. No further mitigation requirements will be necessary beyond Tiering requirements discussed above.

The project would likely generate short-term odors from temporary construction equipment such as from architectural coatings. Since odors from this equipment would be short-term, no significant odor impacts would be expected during construction activities.

The proposed project would adhere to the required 1,000-foot setback requirements as outlined under San Diego County Zoning Ordinance Section 6902, Animal Waste Processing Setback (County of San Diego, 2004). Since the operations are allowed by right and since the project would be consistent with Ordinance Section 6902, the project would not generate adverse impacts
to include odor. It should be noted that the onsite uses (offices, dwelling units, etc.) would be exempt from these setback requirements as this home is part of the overall operations. The project would be required to comply with the County’s nuisance ordinance, which restricts the project site from discharging from any source air contaminants or other material (such as odors) that could be considered an annoyance to any considerable number of persons.

The project development proposed is consistent with the current A72 (General Agriculture) zoning per the General Plan. Based on this, the proposed project was accounted for in the County’s General Plan. Therefore, no cumulative operation impacts would be anticipated since the proposed use would be consistent with the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP).
1.0 INTRODUCTION

1.1 Purpose of this Study

The purpose of this Air Quality study is to determine potential air quality impacts (if any) that may be created during the construction or operation of the proposed Poultry Manure Processing Project located in the Ramona Community Planning Area. Should impacts be determined, the intent of this study would be to recommend mitigation measures to reduce impacts to less than significant when compared to the County of San Diego County Guidelines for Determining Significance for Air Quality (County of San Diego, 2007).

1.2 Project Location and Description

The subject site is located in the Ramona Community Planning Area within unincorporated San Diego County. The project site is located at 25818 State Route 78 (SR 78) (also known as Julian Road) between Rancho Santa Teressa Drive and Casner Road. Access to the site from SR 78 is provided by a private driveway located approximately 1,000 feet west of Rancho Santa Teressa Drive. The overall property on which the existing egg ranch is located spans five contiguous parcels [County Assessor Parcels (APN) 286-030-21, 286-030-22, 286-030-09, 286-031-01, and 286-040-10]. The proposed project would be located on a portion of APN 286-031-01. A general project vicinity map is shown in Figure 1-A.

The applicant proposes to construct a 16,200 square foot (SF) manure processing facility with filtered exhaust (ventilation) and minimal lighting. The poultry manure pelleting system, which will be within the manure processing facility, would allow the existing on-site egg ranch to become more efficient and sustainable. The poultry manure pelleting system would be capable of converting poultry manure into organic fertilizer pellets. Processing the manure on-site and converting the waste into pellets would lower storage and transportation costs and reduce dust and odors generated by the existing manure storage and haul process from an overall reduction in truck trips needed to transport product. The existing General Plan Regional Category for the subject site is Rural and the General Plan land use designation is Rural Lands (RL-40; 1 dwelling unit per 40 acres). The project is an allowed use under the current A72 (General Agriculture) zone that applies to the property with approval of a Major Use Permit (MUP) from the County of San Diego. The proposed MUP area comprises a 6-acre portion of the overall 362.1-acre existing egg ranch property. Construction activities associated with the proposed project would only disturb 2.7 acres and are expected to start in the summer of 2020 and be complete in 6 months. It is estimated that no more than 800 cubic yards (CY) of soil (decomposed granite [d.g.]) will be imported to the site and will be utilized on the existing primary access and around the facilities. Figure 1-B shows the Site Development Plan of the project.
Figure 1-A: Project Vicinity Map

Source: (Google, 2019)
Figure 1-B: Site Development Plan

Source: (International, Michael Baker, 2019)
2.0 EXISTING ENVIRONMENTAL SETTING

2.1 Existing Setting

The location for the proposed building has been selected because of its proximity to the existing farm operations on-site. The building will be placed on a graded pad that was previously used as a location for additional hen houses. The hen houses have since been removed and the site remains heavily disturbed. The project site is predominately barren landscape composed of previously disturbed dirt surfaces and sparse vegetation due to historic and ongoing use by trucks and farming equipment traffic. Site topography is essentially flat open space that gradually slopes to the east and south beyond the development limits of the proposed improvements. The project site is mostly surrounded by agricultural uses though a sensitive residential receptor shares the eastern and southern property line with the project site with receptors approximately 1,200 feet away from the proposed operations.

2.2 Climate and Meteorology

Climate within the San Diego Air Basin (SDAB) area often varies dramatically over short geographical distances with cooler temperatures on the western coast gradually warming to the east as prevailing winds from the west heat up. Most of southern California is dominated by high-pressure systems for much of the year, which keeps San Diego mostly sunny and warm. Typically, during the winter months, the high-pressure system drops to the south and brings cooler, moister weather from the north. It is common for inversion layers to develop within high-pressure areas, which mostly define pressure patterns over the SDAB. These inversions are caused when a thin layer of the atmosphere increases in temperature with height. An inversion acts like a lid preventing vertical mixing of air through convective overturning.

Meteorological trends within the Ramona have daytime highs ranging between 66ºF in the winter to approximately 91ºF in the summer with August usually being the hottest month. Minimum temperatures range from approximately 38.0ºF in the winter to approximately 57ºF in the summer. Precipitation is generally about 16.2 inches per year (WRCC, 2019). Prevailing wind patterns for the area vary during any given month during the year and also vary depending on the time of day or night. The predominant pattern though throughout the year is usually from the west or westerly (WRCC, 2018).
2.3 Regulatory Standards

2.3.1 Federal Standards and Definitions

The Federal Air Quality Standards were developed per the requirements of The Federal Clean Air Act, which is a federal law that was passed in 1970 and further amended in 1990. This law provides the basis for the national air pollution control effort. An important element of the act included the development of National Ambient Air Quality Standards (NAAQS) for major air pollutants.

The Clean Air Act established two types of air quality standards otherwise known as primary and secondary standards. **Primary Standards** set limits for the intention of protecting public health, which includes sensitive populations such as asthmatics, children and elderly. **Secondary Standards** set limits to protect public welfare to include the protection against decreased visibility, damage to animals, crops, vegetation and buildings.

The EPA Office of Air Quality Planning and Standards (OAQPS) has set NAAQS for principal pollutants, which are called "criteria" pollutants. These pollutants are defined below:

1. **Carbon Monoxide (CO):** is a colorless, odorless, and tasteless gas and is produced from the partial combustion of carbon-containing compounds, notably in internal-combustion engines. Carbon monoxide usually forms when there is a reduced availability of oxygen present during the combustion process. Exposure to CO near the levels of the ambient air quality standards can lead to fatigue, headaches, confusion, and dizziness. CO interferes with the blood’s ability to carry oxygen.

2. **Lead (Pb):** is a potent neurotoxin that accumulates in soft tissues and bone over time. The major sources of lead emissions have historically been motor vehicles (such as cars and trucks) and industrial sources. Because lead is only slowly excreted, exposures to small amounts of lead from a variety of sources can accumulate to harmful levels. Effects from inhalation of lead near the level of the ambient air quality standard include impaired blood formation and nerve conduction. Lead can adversely affect the nervous, reproductive, digestive, immune, and blood-forming systems. Symptoms can include fatigue, anxiety, short-term memory loss, depression, weakness in the extremities, and learning disabilities in children.

3. **Nitrogen Dioxide (NO₂):** is a reactive, oxidizing gas capable of damaging cells lining the respiratory tract and is one of the nitrogen oxides emitted from high-temperature combustion, such as those occurring in trucks, cars, power plants, home heaters, and gas stoves. In the presence of other air contaminants, NO₂ is usually visible as a reddish-brown air layer over urban areas. NO₂ along with other traffic-related pollutants is associated with respiratory symptoms, respiratory illness and respiratory impairment. Studies in animals have reported biochemical, structural, and cellular changes in the lung when exposed to NO₂ above the level of the current state air quality standard. Clinical studies of human subjects suggest that NO₂ exposure to levels near the current standard may worsen the effect of allergens in allergic asthmatics, especially in children.

4. **Particulate Matter (PM₁₀ or PM₂.₅):** is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary in shape, size and chemical composition, and can be made up of multiple materials such as metal, soot, soil, and dust. PM₁₀ particles are 10 microns (μm) or less and PM₂.₅ particles are...
2.5 (μm) or less. These particles can contribute significantly to regional haze and reduction of visibility in California. Exposure to PM levels exceeding current air quality standards increases the risk of allergies such as asthma and respiratory illness.

5. **Ozone (O₃):** is a highly oxidative unstable gas capable of damaging the linings of the respiratory tract. This pollutant forms in the atmosphere through reactions between chemicals directly emitted from vehicles, industrial plants, and many other sources. Exposure to ozone above ambient air quality standards can lead to human health effects such as lung inflammation, tissue damage and impaired lung functioning. Ozone can also damage materials such as rubber, fabrics and plastics.

6. **Sulfur Dioxide (SO₂):** is a gaseous compound of sulfur and oxygen and is formed when sulfur-containing fuel is burned by mobile sources, such as locomotives, ships, and off-road diesel equipment. SO₂ is also emitted from several industrial processes, such as petroleum refining and metal processing. Effects from SO₂ exposures at levels near the one-hour standard include bronchoconstriction accompanied by symptoms, which may include wheezing, shortness of breath and chest tightness, especially during exercise or physical activity. Children, the elderly, and people with asthma, cardiovascular disease or chronic lung disease (such as bronchitis or emphysema) are most susceptible to these symptoms. Continued exposure at elevated levels of SO₂ results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality.

### 2.3.2 State Standards and Definitions

California Air Resource Board (CARB) sets the laws and regulations for air quality on the state level. The California Ambient Air Quality Standards (CAAQS) is similar to the NAAQS and also restricts four additional contaminants. Table 2.1 on the following page identifies both the NAAQS and CAAQS. The additional contaminants as regulated by the CAAQS are defined below:

1. **Visibility Reducing Particles:** Particles in the Air that obstruct the visibility.

2. **Sulfates:** are salts of Sulfuric Acid. Sulfates occur as microscopic particles (aerosols) resulting from fossil fuel and biomass combustion. They increase the acidity of the atmosphere and form acid rain.

3. **Hydrogen Sulfide (H₂S):** is a colorless, toxic and flammable gas with a recognizable smell of rotten eggs or flatulence. H₂S occurs naturally in crude petroleum, natural gas, volcanic gases, and hot springs. Usually, H₂S is formed from bacterial breakdown of organic matter. Exposure to low concentrations of hydrogen sulfide may cause irritation to the eyes, nose, or throat. It may also cause difficulty in breathing for some asthmatics. Brief exposures to high concentrations of hydrogen sulfide (greater than 500 Parts per Million (ppm)) can cause a loss of consciousness and possibly death.

4. **Vinyl Chloride:** also known as chloroethene and is a toxic, carcinogenic, colorless gas with a sweet odor. It is an industrial chemical mainly used to produce its polymer, polyvinyl chloride (PVC).
Table 2.1: Ambient Air Quality Standards

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Average Time</th>
<th>California Standards</th>
<th>Federal Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Concentration</td>
<td>Method</td>
</tr>
<tr>
<td></td>
<td></td>
<td>ppm</td>
<td></td>
</tr>
<tr>
<td>Ozone (O₃)</td>
<td>1 Hour</td>
<td>0.09 ppm (180 µg/m³)</td>
<td>Ultraviolet Photometry</td>
</tr>
<tr>
<td></td>
<td>8 Hour</td>
<td>0.070 ppm (137 µg/m³)</td>
<td></td>
</tr>
<tr>
<td>Respirable Particulate Matter (PM10)</td>
<td>24 Hour</td>
<td>20 µg/m³</td>
<td>Gravimetric or Beta Attenuation</td>
</tr>
<tr>
<td>Fine Particulate Matter (PM2.5)</td>
<td>24 Hour</td>
<td>No Separate State Standard</td>
<td>35 µg/m³</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Annual Arithmetic Mean</td>
<td>12 µg/m³</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8 Hour (Lake Tahoe)</td>
<td>9 ppm (10 mg/m³)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1 hour</td>
<td>20 ppm (23 mg/m³)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8 Hour (Lake Tahoe)</td>
<td>6 ppm (7 mg/m³)</td>
</tr>
<tr>
<td>Nitrogen Dioxide (NO₂)</td>
<td>1 Hour</td>
<td>0.18 ppm (139 µg/m³)</td>
<td>Gas Phase Chemiluminescence</td>
</tr>
<tr>
<td>Sulphur Dioxide (SO₂)</td>
<td>24 Hour</td>
<td>0.04 ppm (105 µg/m³)</td>
<td>Ultraviolet Fluorescence</td>
</tr>
<tr>
<td></td>
<td>3 Hour</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1 Hour</td>
<td>0.25 ppm (655 µg/m³)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>30 Day Average</td>
<td>1.5 µg/m³</td>
<td>Atomic Absorption</td>
</tr>
<tr>
<td></td>
<td>Rolling 3-Month Average</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Visibility Reducing Particles</td>
<td>8 Hour</td>
<td>See footnote 14</td>
<td>-</td>
</tr>
<tr>
<td>Sulfates</td>
<td>24 Hour</td>
<td>25 µg/m³</td>
<td>Ion Chromatography</td>
</tr>
<tr>
<td>Hydrogen Sulfide</td>
<td>1 Hour</td>
<td>0.03 ppm (42 µg/m³)</td>
<td>Ultraviolet Fluorescence</td>
</tr>
<tr>
<td>Vinyl Chloride</td>
<td>24 Hour</td>
<td>0.01 ppm (26 µg/m³)</td>
<td>Gas Chromatography</td>
</tr>
</tbody>
</table>

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equalled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured, at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent procedure which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7. Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.

8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

9. On October 1, 2015, the national annual PM2.5 primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

11. On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2008 standards are approved.

12. The CARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

14. In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Source: (California Air Resources Board, 5/4/2016)
2.3.3 Regional Standards

The State of California has 35 specific air districts, which are each responsible for ensuring that the criteria pollutants are below the NAAQS and CAAQS. California Air basins that exceed either the NAAQS or the CAAQS for any criteria pollutants are designated as “non-attainment areas” for that pollutant. Currently, there are 15 non-attainment areas for the federal ozone standard and two non-attainment areas for the PM$_{2.5}$ standard and many areas are in non-attainment for PM$_{10}$ as well. The state therefore created the California State Implementation Plan (SIP), which is designed to provide control measures needed for California Air basins to attain ambient air quality standards.

The San Diego County Air Pollution Control District (SDAPCD) is the government agency which regulates sources of air pollution within San Diego County. Therefore, the SDAPCD developed a Regional Air Quality Strategy (RAQS) to provide control measures to try to achieve attainment status for state ozone standards with control measures focused on Volatile Organic Compounds (VOCs) and oxides of nitrogen (NOX). Currently, San Diego is in “non-attainment” status for federal O$_3$ and the State PM$_{10}$, PM$_{2.5}$, and O$_3$; however, an attainment plan is only available for O$_3$. The RAQS was adopted in 1992 and has been updated as recently as 2016 which was the latest update incorporating minor changes to the prior 2009 update.

The 2016 update mostly summarizes how the 2009 update has lowered NOX and VOCs emissions which reduces ozone and clarifies and enhances emission reductions by introducing for discussion three new VOC and four new NOX reduction measures. NOX and VOCs are Ozone precursors and react organically to form Ozone. The criteria pollutant standards are generally attained when each monitor within the region has had no exceedances during the previous three calendar years. A complete listing of the current attainment status with respect to both federal and state nonattainment status by pollutants for San Diego County is shown in Table 2.2 on the following page (SDAPCD, 2019).

The RAQS is largely based on population predictions by the San Diego Association of Governments (SANDAG). Projects that produce less growth than predicted by SANDAG would generally conform to the RAQS. Projects that create more growth than projected by SANDAG may create a significant impact if the project produces unmitigable air quality emissions or if the project produces cumulative impacts.
### Table 2.2: San Diego County Air Basin Attainment Status by Pollutant

<table>
<thead>
<tr>
<th>Criteria Pollutant</th>
<th>Federal Designation</th>
<th>State Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ozone (8-Hour)</td>
<td>Nonattainment</td>
<td>Nonattainment</td>
</tr>
<tr>
<td>Ozone (1-Hour)</td>
<td>Attainment *</td>
<td>Nonattainment</td>
</tr>
<tr>
<td>Carbon Monoxide</td>
<td>Attainment</td>
<td>Attainment</td>
</tr>
<tr>
<td>PM10</td>
<td>Unclassifiable **</td>
<td>Nonattainment</td>
</tr>
<tr>
<td>PM2.5</td>
<td>Attainment</td>
<td>Nonattainment</td>
</tr>
<tr>
<td>Nitrogen Dioxide</td>
<td>Attainment</td>
<td>Attainment</td>
</tr>
<tr>
<td>Sulfur Dioxide</td>
<td>Attainment</td>
<td>Attainment</td>
</tr>
<tr>
<td>Lead</td>
<td>Attainment</td>
<td>Attainment</td>
</tr>
<tr>
<td>Sulfates</td>
<td>No Federal Standard</td>
<td>Attainment</td>
</tr>
<tr>
<td>Hydrogen Sulfide</td>
<td>No Federal Standard</td>
<td>Unclassified</td>
</tr>
<tr>
<td>Visibility</td>
<td>No Federal Standard</td>
<td>Unclassified</td>
</tr>
</tbody>
</table>

* The federal 1-hour standard of 12 ppb was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

** At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

---

### 2.4 California Environmental Quality Act (CEQA) Significance Thresholds

The California Environmental Quality Act has provided a checklist to identify the significance of air quality impacts. These guidelines are found in Appendix G of the CEQA guidelines and are as follows:

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

1. Conflict with or obstruct implementation of the RAQS or applicable portions of the SIP?

2. Result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?

3. 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 (PM<sub>10</sub>, PM<sub>2.5</sub> or exceed quantitative thresholds for O<sub>3</sub> precursors, NO<sub>x</sub> and VOCs)?
4: Expose sensitive receptors (including, but not limited to, schools, hospitals, residences, resident care facilities, or day-care centers) to substantial pollutant concentrations?

5: Create objectionable odors affecting a substantial number of people?

These guidelines are based on the version of the CEQA Guidelines Appendix G questions for air quality that were used prior to Appendix G being updated in 2019. The 2019 updated version combined guideline criteria 2 and 3. The pre-2019 guidelines are retained in this analysis for consistency with the General Plan EIR.

2.5 SDAPCD Rule 20.2 – Air Quality Impact Assessment Screening Thresholds

The SDAPCD has established analysis trigger criteria in Rule 20.2 for new or modified stationary sources. The County’s Guidelines for Determining Significance and Report Format and Content Requirements incorporate this trigger criteria from Rule 20.2 as Screening Level Thresholds (SLTs) for use in all County related Air Quality Impact Assessments (AQIA) and for determining CEQA air quality impacts (County of San Diego, 2007). These SLTs can be used to demonstrate that a project’s total emissions would not result in a significant impact as defined by CEQA. Also, since SDAPCD does not have STLs for VOCs, the County has adopted the SCAQMD VOC screening level for the Coachella Valley. Should emissions be found to exceed these SLTs, additional modeling would be required to demonstrate that the project’s air quality impacts would not result in exceedances of state and federal ambient air quality standards. These SLTs for construction and daily operations are shown in Table 2.3 on the following page.

Non-Criteria pollutants such as Hazardous Air Pollutants (HAPs) or Toxic Air Contaminants (TACs) are also regulated by the SDAPCD. Rule 1200 (Toxic Air Contaminants - New Source Review) adopted on June 12, 1996, requires evaluation of potential health risks for any new, relocated, or modified emission unit which may increase emissions of one or more toxic air contaminants. The rule requires that projects that would result in a potential increase in cancer risk greater than one in one million are required to implement toxics best available control technology (T-BACT) or impose the most effective emission limitation, emission control device or control technique to reduce the cancer risk. At no time shall the project increase the incremental cancer risk to over 10 in one million with the application of T-BACT or a health hazard index (chronic and acute) greater than one since risks above. Projects that are estimated to result in an increase in cancer risks less than one in one million are not required to implement T-BACT technology.

The U.S. EPA uses the term VOC and the CARB’s Emission Inventory Branch (EIB) uses the term Reactive Organic Gases (ROG) to essentially define the same thing. There are minor
deviations between compounds that define each term however for purposes of this study we will assume they are essentially the same due to the fact SCAQMD interchanges these words and because Air Quality models directly calculates ROG in place of VOC.

### Table 2.3: Screening Level Thresholds for Criteria Pollutants

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Total Emissions (Pounds per Day)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Construction Emissions</strong></td>
<td></td>
</tr>
<tr>
<td>Respirable Particulate Matter (PM$<em>{10}$ and PM$</em>{2.5}$)</td>
<td>100 and 55</td>
</tr>
<tr>
<td>Nitrogen Oxide (NO$_x$)</td>
<td>250</td>
</tr>
<tr>
<td>Sulfur Oxide (SO$_x$)</td>
<td>250</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>550</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOCs) *</td>
<td>75</td>
</tr>
<tr>
<td><strong>Operational Emissions</strong></td>
<td></td>
</tr>
<tr>
<td>Respirable Particulate Matter (PM$<em>{10}$ and PM$</em>{2.5}$)</td>
<td>100 and 55</td>
</tr>
<tr>
<td>Nitrogen Oxide (NO$_x$)</td>
<td>250</td>
</tr>
<tr>
<td>Sulfur Oxide (SO$_x$)</td>
<td>250</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>550</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOCs) *</td>
<td>75</td>
</tr>
</tbody>
</table>

**Notes:**

* Threshold for VOCs is based on the significance threshold for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley.

### 2.6 Local Air Quality

Criteria pollutants are measured continuously throughout the SDAB. This data is used to track ambient air quality patterns throughout the County. As mentioned earlier, this data is also used to determine attainment status when compared to the NAAQS and CAAQS. The SDAPCD is responsible for monitoring and reporting monitoring data. SDAPCD operates 11 monitoring sites, which collect data on criteria pollutants. The proposed development project is closest to the Alpine and El Cajon monitoring stations which are located approximately 15.7 and 21.5 miles respectively from the project site. Table 2.4 on the following page identifies the criteria pollutants monitored at the aforementioned station.

Four additional sites collect meteorological data which is used by the District to assist with pollutant forecasting, data analysis and characterization of pollutant transport. SDAPCD published the five year air quality summary for all of the monitoring stations however only data within the last three years is shown as this adequately identifies the background ambient air quality environment (SDAPCD, 2018).
Table 2.4: Three-Year Ambient Air Quality Summary near the Project Site

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Monitoring Stations</th>
<th>Averaging Time</th>
<th>CAAQS</th>
<th>NAAQS</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>Days Exceeded over 3 years</th>
</tr>
</thead>
<tbody>
<tr>
<td>* O₃ (ppm)</td>
<td>Alpine or El Cajon Monitoring Station</td>
<td>1 Hour</td>
<td>0.09 ppm</td>
<td>No Standard</td>
<td>0.11</td>
<td>0.10</td>
<td>0.11</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8 Hour</td>
<td>0.070 ppm</td>
<td>0.070 ppm</td>
<td>0.10</td>
<td>0.08</td>
<td>0.08</td>
<td>84</td>
</tr>
<tr>
<td></td>
<td></td>
<td>24 Hour</td>
<td>50 µg/m³</td>
<td>150 µg/m³</td>
<td>50</td>
<td>43</td>
<td>38</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Annual</td>
<td>No Standard</td>
<td>22.5</td>
<td>22.7</td>
<td>19.3</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>PM₁₀ (µg/m³)</td>
<td>Alpine Location Identified with *</td>
<td>24 Hour</td>
<td>No standard</td>
<td>35 µg/m³</td>
<td>31.8</td>
<td>36.2</td>
<td>23.8</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Annual</td>
<td>No Standard</td>
<td>12 µg/m³</td>
<td>9.6</td>
<td>9.6</td>
<td>8.6</td>
<td>N/A</td>
</tr>
<tr>
<td>PM₂.₅ (µg/m³)</td>
<td></td>
<td>Annual</td>
<td>No Standard</td>
<td>0.030 ppm</td>
<td>0.053 ppm</td>
<td>0.004</td>
<td>0.003</td>
<td>0.003</td>
</tr>
<tr>
<td>* NO₂ (ppm)</td>
<td></td>
<td>1 Hour</td>
<td>0.18 ppm</td>
<td>0.100 ppm</td>
<td>0.048</td>
<td>0.033</td>
<td>0.028</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8 Hour</td>
<td>9 ppm</td>
<td>9 ppm</td>
<td>1.4</td>
<td>1.1</td>
<td>1.0</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Notes:
1. Days exceeded marked with “N/A” indicate no data available
2. * Data was selected from the Alpine Monitoring Station. All other data presented was collected at the El Cajon Monitoring Station.
3. SO₂ is only monitored at the El Cajon Monitoring Station. Within the entire County of San Diego, SO₂ emissions within the County are essentially zero for all metrics including the Average, Maximum 24 hour and 1-hour standards. The highest 1-hr measurement identified is 0.004 ppm and the most restrictive standard (CAAQS for SO₂) is 0.25 ppm.
3.0 METHODOLOGY

3.1 Construction Emissions Calculations

Air Quality impacts related to construction and daily operations were calculated using the latest CalEEMod 2016.3.2 air quality model, which was developed by BREEZE Software for South Coast Air Quality Management District (SCAQMD) in 2017. The construction module in CalEEMod is used to calculate the emissions associated with the construction of the Project and uses methodologies presented in the US EPA AP-42 document with emphasis on Chapter 11.9. The CalEEMod input/output model is shown in Attachment A to this report. It should be noted that CalEEMod has since released version 2020.4.0 though at the time this report was started was not available. CalEEMod 2016.3.2 has been found to yield slightly higher emissions than 2020.4.0 and is conservative.

The AERMOD dispersion model will be used to determine the concentration for air pollutants at any location near the pollutant generator. Additionally, the model will predict the maximum exposure distance and concentrations. The notable toxic air contaminant from construction is diesel exhaust, or diesel particulate matter (DPM), since exposure to diesel exhaust is known to cause cancer and acute and chronic health effects. DPM emissions can be estimated using the annual PM$_{10}$ exhaust emissions from onsite construction operations obtained from the annual CalEEMod model output by summing each onsite source for the construction duration. The AERMOD input/output file for the proposed project is shown in Attachments B and C for both unmitigated and mitigated scenarios with sensitive residential receptors included.

Once the dispersed concentrations of DPM are estimated in the surrounding air, they are used to evaluate estimated exposure to people. Exposure is evaluated by calculating the dose in milligrams per kilogram body weight per day (mg/kg/d). For residential exposure, the breathing rates are determined for specific age groups, so inhalation dose (Dose-air) is calculated for each of these age groups, 3rd trimester, 0<2, 2<9, 2<16, 16<30 and 16-70 years. The cancer risk dose calculation is defined in Equation 1 (County of San Diego, 2007):

$$Dose_{air} = C_{air} * (BR/BW) * A * EF * (1x10^{-6})$$

- $Dose_{air}$ = Dose through inhalation (mg/kg/d)
- $C_{air}$ = Concentration in air (µg/m$^3$) Annual average DPM concentration in µg/m$^3$ - SCREEN3 predicts a 1-hr concentration and is corrected to an annual average by multiplying the 1-hr average by 0.08 (US EPA, 1992)
- $BR/BW$ = Daily breathing rate normalized to body weight (L/kg BW-day). See Table I.2 for the daily breathing rate for each age range.
- $A$ = Inhalation absorption factor (assumed to be 1)
- $EF$ = Exposure frequency (unitless, days/365 days)
- $1x10^{-6}$ = Milligrams to micrograms conversion (10$^{-3}$ mg/µg), cubic meters to liters conversion (10$^{-3}$ m$^3$/l)
Cancer risk is calculated by multiplying the daily inhalation or oral dose, by a cancer potency factor, the age sensitivity factor, the frequency of time spent at home and the exposure duration divided by averaging time, to yield the excess cancer risk. As described below, the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk for any given location. Specific factors as modeled are shown within the project models attached to this report. The cancer risk calculation is defined in Equation 2 (OEHHA, February 2015):

\[
RISK_{\text{inh-res}} = \text{DOSE}_{\text{air}} \times \text{CPF} \times \text{ASF} \times \frac{\text{ED}}{\text{AT}} \times \text{FAH}
\]

- \( RISK_{\text{inh-res}} \) = Residential inhalation cancer risk
- \( \text{DOSE}_{\text{air}} \) = Daily inhalation dose (mg/kg-day)
- \( \text{CPF} \) = Inhalation cancer potency factor (mg/kg-day \(^{-1}\))
- \( \text{ASF} \) = Age sensitivity factor for a specified age group (unitless)
- \( \text{ED} \) = Exposure duration (in years) for a specified age group
- \( \text{AT} \) = Averaging time for lifetime cancer risk (years)
- \( \text{FAH} \) = Fraction of time spent at home (unitless)

The California Office of Environmental Health Hazard Assessment (OEHHA) recommends that an exposure duration (residency time) of 30 years be used to estimate individual cancer risk for the Maximally Exposed Individual Resident (MEIR). OEHHA also recommends that the 30-year exposure duration be used as the basis for public notification and risk reduction audits and plans. Exposure durations of 9-years and 70-years are also recommended to be evaluated for the MEIR to show the range of cancer risk based on residency periods. If a facility is notifying the public regarding cancer risk, the 9- and 70-year cancer risk estimates are useful for people who have resided in their current residence for periods shorter and longer than 30 years. Health risk calculations are shown in Attachment D.

Non-Cancer risks or risks defined as chronic or acute are also known with respect to DPM and are determined by the hazard index. To calculate hazard index, DPM concentration is divided by its chronic Reference Exposure Levels (REL). Where the total equals or exceeds one, a health hazard is presumed to exist. RELs are published by the Office of Environmental Health Hazard Assessment (OEHHA, February 2015). Diesel Exhaust has a REL of 5 μg/m\(^3\) and targets the respiratory system. A graphical representation of the modeling locations is shown on a site aerial below in Figure 3-A. The red points (1-6) represent the sensitive residential receptor locations where air quality emissions are calculated by AERMOD. For purposes of analysis an unmitigated and mitigated model was created. It should be noted that receptors 4 and 5 are onsite and are considered part of the existing operations. Receptor 4 is the closest receptor to the site and is roughly 850 feet from the project site. Then next closest is receptor 5 which is roughly 900 feet from the project site. Offsite receptors are approximately at least 1,200 feet from the project site.
Figure 3-A: Construction Health Risk Model Setup
3.2 Construction Assumptions

The project construction dates were estimated based on a construction kickoff starting and completing approximately 6 months later or sometime completing in 2021.

CalEEMod 2016.3.2 was utilized for all calculations. Table 3.1 shows the expected timeframes for the construction processes for all the project infrastructure, facilities, improvements and structures at the proposed project location, as well as the expected number of pieces of equipment. It should be noted that grading will include a balance scenario with about 3,000 cubic yards of earthwork with an additional 800 CY of imported d.g. for roadway surface preparation. CalEEMod has been updated to reflect the anticipated construction activities and dates provided by the Project applicant.

<table>
<thead>
<tr>
<th>Equipment Identification</th>
<th>Proposed Start</th>
<th>Proposed Completion</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Preparation</td>
<td>06/01/2021</td>
<td>06/07/2021</td>
<td>1</td>
</tr>
<tr>
<td>Rubber Tired Dozers</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Tractors/Loaders/Backhoes</td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Grading</td>
<td>06/08/2021</td>
<td>06/17/2021</td>
<td></td>
</tr>
<tr>
<td>Graders</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Rubber Tired Dozers</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Tractors/Loaders/Backhoes</td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Building Construction</td>
<td>06/18/2021</td>
<td>10/29/2021</td>
<td></td>
</tr>
<tr>
<td>Crane</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Forklifts</td>
<td></td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>Generator Sets</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Tractors/Loaders/Backhoes</td>
<td></td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>Welders</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Architectural Coating</td>
<td>10/06/2021</td>
<td>10/29/2021</td>
<td></td>
</tr>
<tr>
<td>Air Compressor</td>
<td></td>
<td></td>
<td>1</td>
</tr>
</tbody>
</table>

This equipment list is based upon equipment inventory within CalEEMod and through direction from the project applicant.

3.3 Operational Assumptions

Once the manure processing facility is operational, the project would modify existing manure processing operations with a more efficient and sustainable method as it relates to labor and logistics. A description of the existing operation and a description of how the proposed manure processing facility would increase operation efficiency is discussed below.
**Existing Operations:**

The site is currently occupied by an existing “Egg Ranch” with a capacity to operate with up to 3 million chickens and produces up to 1,125 tons of manure per week which is all transported offsite for processing into fertilizer. The existing egg ranch and the potential future 3 million chicken operation is a by right use under current County zoning.

The site operations require up to 5 full-time workers (Michael Baker International, 2020). Trucks are currently loaded Monday through Saturday from 4:00 a.m. to 3:00 p.m. It typically takes approximately 2-3 hours to load one truck.

**Proposed Operations:**

Demler Brothers, LLC (Applicant) proposes to construct a 16,200 square foot (sq. ft.) building to house a poultry manure pelleting system (proposed project) which would allow the existing on-site egg ranch to process manure into pellets on-site rather than ship the unprocessed manure off-site. Manure from a chicken (About 0.75 lbs/week) has a moisture content of roughly 75% (Ritz, 2013). The palletization process requires manure to be at 15% or a 60% reduction in moisture content. This process will both reduce weight and volume which will reduce transport requirements (US EPA, Not Dated).

The proposed project would reduce the maximum truckloads generated per week from 48 to 30, an approximately 33 percent reduction in project generated truck traffic compared to existing operations. The typical truck trip length for both the proposed project and the existing use would be similar with typical trips traveling as far as El Centro or 115 miles one way. Employee trips would be local. Since CalEEMod is limited to a single trip distance to reflect the whole project, two separate CalEEMod files were prepared for this analysis. One model represents the entire project with the extended length heavy truck trips and one model to represent the employee trips only. Combined, the two provide an estimate of total emissions generated by the project. Both model runs are shown in Attachment A to this report.

The proposed project would continue to use the existing manure collection methods within their hen houses. Currently, conveyor belts inside the hen houses transports the manure into semi-truck trailers, which then haul the manure off-site. Instead, manure would be collected and transported to the proposed pelleting system on-site. The existing hen houses, immediately adjacent to the proposed project (not a part of this MUP), would have covered conveyor belts that would transport the manure from the hen houses to the proposed manure pelleting building. On the way to the pelleting building, the conveyor belts would pass through a drying system that is heated from hot air blown out from the existing fans of the henhouses.
The conveyor belts would be self-automated and run on a set schedule. Manure from the older hen houses would first be collected in existing on-site dry wells then transported to the proposed manure processing facility via existing on-site trucks. The proposed building would house three prefabricated 100 horsepower (HP)/75 kW electric manure processing units that would run the pelleting process. The electric motors have been designed to operate at optimal efficiency between 60 and 80 percent load (U.S. Department of Energy). The entire pelleting process would run on electricity and require no fuel, besides for the trucking of materials.

Table 3.2: Change in Total Manure Site Output

<table>
<thead>
<tr>
<th></th>
<th>Manure per Chicken per Week (pounds)</th>
<th>Total Exported Manure per Week (tons)</th>
<th>Truckloads per Week</th>
<th>Truckloads per Day (Monday-Saturday)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current Operational Capacity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unprocessed Manure (3 million chickens)</td>
<td>0.75</td>
<td>1,125</td>
<td>48</td>
<td>8</td>
</tr>
<tr>
<td>Proposed– Pelleted Manure Operations (3 million chickens)</td>
<td>750 $^2$</td>
<td>30</td>
<td>5</td>
<td></td>
</tr>
</tbody>
</table>

$^1$ Transport trucks are assumed to have a capacity of approximately 23 to 25 tons of manure due to volume capacity of standard truck that are currently be utilized at the site.

$^2$ Proposed manure processing operations would reduce the total tonnage of manure produced by approximately 33%.

Placement of the proposed project on the subject site would adhere to the required 1,000-foot setback from the nearest pool, tennis court, public playground or residential dwelling units, as outlined under San Diego County Zoning Ordinance Section 6902, Animal Waste Processing Setback. In addition to the setback, the MUP would limit operation of the proposed manure pelleting system to the hours of 6:00 a.m. to 10:00 p.m. (16 hours a day) every day of the year (with exception of holidays).

The applicant has indicated that the proposed project would be served trucking the water onsite as needed for construction. Since earthwork activities are expected over 13 days, it’s assumed that 26 truck trips would be necessary for water uses during construction and were assumed to be 20 mile trips to the Ramona Water District. The only additional water usage from the project would be during operations at the processing plant which would require roughly 400,000 gallons of water per year which will also be trucked to the site from the Ramona Water district located roughly 15 miles away. Altogether, it’s assumed that roughly 100 trucks would be needed for water purposes per year. These truck trips were included in the CalEEMod file for the project.
For purposes of this worst-case assessment, it is assumed the drying facility will operate 365 days per year for 16 hours per day or 5,840 hours per year. Multiplying the rated motor load by the optimal 80 percent load by the operational hours would yield the total energy consumed by the operation or 75 kW * 0.80 x 5,840 hours per unit x 3 units which is 1,051,200 kilowatt hours (kWh) per year. It should be noted that the facility would not use natural gas. Additionally, as noted in section 1.2 above, the facility will be lit using several interior and exterior lights for safety purposes. A worst-case assumption using 80 40-watt LED light fixtures was assumed. Each fixture would consume 3.2 kW to operate. Assuming the same operational hours, the project would consume 3.2 kW*5,840 hours or 18,688 kWh per year. Combined the project would consume 1,069,888 kWh per year.

3.4 Micro Scale Operational Emissions

Air pollutant emissions related to Project traffic have the potential to create new or worsen existing localized air quality violations with respect to carbon monoxide (CO). These increased carbon monoxide “Hot Spots” are determined through the utilization of the Institute of Transportation Studies (ITS) Transportation Project-Level Carbon Monoxide Protocol (University of California, Davis for California Department of Transportation, 1997).

In the event the proposed project traffic adds vehicular trips to either an intersection that operates at Level of Service (LOS) E or F or any intersection where the project trips re-classify the intersection level of service from LOS D or better to LOS E or F and when peak-hour trips exceed 3,000 the project must quantify CO levels (County of San Diego, 2007).

The proposed project would reduce vehicular trips and would therefore not add enough trips to the nearby roadway networks to exceed thresholds requiring a CO hotspot analysis. Based on this a less than significant CO hotspot impact is expected.

3.5 Odor Impacts (Onsite)

Potential onsite odor generators would include short term construction odors from activities such as Architectural Coating (painting) or perhaps diesel equipment. Construction operations are fairly quick and are not expected to cause significant long-term odor impacts. Therefore, less than significant odor impacts would be expected from construction.

Long term odors from the proposed project would be reduced from existing operations since the manure will be processed within a newly constructed 16,200 SF building which would have a ventilation filtration systems included. The filtration system would reduce many odors from chickens but will also filter ammonia a primary odor generating substance from poultry production. Furthermore, placement of the proposed project on the subject site would adhere
to the required 1,000-foot setback requirements as outlined under San Diego County Zoning Ordinance Section 6902, Animal Waste Processing Setback. Since the operations are allowed by right and since the project would be consistent with Ordinance Section 6902, the project would not generate adverse impacts to include odor. Throughout project operations, the project would be required to comply with APCD nuisance rules which prohibit the discharge of any source of air contaminants or other material (including odors) which could cause annoyance to a considerable number of persons. Given this, less than significant long-term odor impact would be expected. It should be noted that the onsite uses (offices, dwelling units, etc.) would be exempt from these setback requirements as this home is part of the overall operations.
4.0 FINDINGS

4.1 Construction Health Risks

Based upon the annual air quality modeling results attached to this report, worst-case unmitigated PM$_{10}$ from exhaust emissions would cumulatively produce 0.05879 tons over the construction duration of 184-days or an average of 0.0033 grams/second. The average emission rate over the grading area is 3.07x10$^{-7}$ g/m$^2$/s, which was calculated as follows:

\[
\frac{0.0033 \text{ grams/second}}{2.7 \text{ acres} \times 4,046 \text{ meters}^2 \text{/acre}} = 3.07 \times 10^{-7} \text{ grams/meter}^2/\text{second}
\]

Utilizing the AERMOD dispersion model, we find that the annual concentration is 0.243 µg/m$^3$ during construction. Utilizing the risk equation identified above in Section 3.1, the inhalation cancer risk for the closest residential receptor (Receptor 4) using the standard mix of equipment within CalEEMod with no emissions reducing mitigation was found to be 53.7 in one million which would be a potentially significant impact. Therefore, in accordance with SDAPCD Rule 20.2, the project is required to implement T-BACT equipment or impose the most effective emission limitation, emission control device or control technique to reduce the cancer risk. At no time shall the project increase the cancer risk to over 10 in one million.

It was found that these impacts can be reduced to less than significant through the utilization of Tier 3 or better equipment with DPF equipment. Currently the T-BACT equipment is Tier 4 though this analysis conservatively assumes only the application Tier 3 engines in construction equipment. This conservative analysis was prepared to demonstrate if the project’s impacts would fall below the 10 in one million threshold should the contractor not be able to provide Tier 4/T-BACT for every piece of equipment used during construction. With the incorporation of T-BACT equipment (Tier 3 or better), the project would cumulatively produce approximately 0.00709 tons of PM$_{10}$ (0.000404 grams/second) over the same construction duration as described above which would result in a reduction of approximately 0.0517 tons of PM$_{10}$ when compared to the worst case scenario (0.05879 tons of PM$_{10}$). Based on this projection, the mitigated average emission rate over the grading area is 3.70x10$^{-8}$ g/m$^2$/s.

Utilizing the AERMOD dispersion model, we find that the annual concentration is 0.0293 µg/m$^3$ during construction at the closest residential receptor. Given this, the inhalation cancer risk for the closest residential receptor would be reduced to 6.48 per one million exposed instead of 53.7 per one million exposed in the worst-case scenario. With incorporation of T-BACT equipment, emissions from the project would not exceed the threshold of significance, which is 10 in one million exposed. Therefore, with the implementation of T-BACT equipment, the project is in compliance with SDAPCD Rule 20.2. Impacts would be considered a less than
significant impact under CEQA. As stated above, the detailed calculations for both the unmitigated and mitigated scenario are shown in Attachment D.

Finally, there are known chronic health risks associated with DPM which are considered non-cancer risks. These risks are calculated based on methods identified in Section 3.1 of this report. From this we find that the annual concentration of 0.0029 µg/m³ divided by the REL of 5 µg/m³ yields a Health Hazard Index of 0.0059, which is less than one. Therefore, non-cancer health risks are not expected, and all health risks are considered less than significant.

4.2 Construction Emission Findings

Construction emissions in pounds per day from the construction operations and equipment identified in Section 3.2 above is shown in Table 4.1. Based on these numbers, the project would not exceed County standards and would not require mitigation to comply.

Table 4.1: Expected Construction Emissions Summary – Pounds per Day

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<thead>
<tr>
<th>Year</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>PM10 (Dust)</th>
<th>PM10 (Exhaust)</th>
<th>PM10 (Total)</th>
<th>PM2.5 (Dust)</th>
<th>PM2.5 (Exhaust)</th>
<th>PM2.5 (Total)</th>
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<td>9.12</td>
<td>15.90</td>
<td>20.09</td>
<td>0.03</td>
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<td>6.98</td>
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<td>0.15</td>
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<td>550</td>
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<td>100</td>
<td>-</td>
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<td>No</td>
<td>No</td>
<td>-</td>
<td>-</td>
<td>No</td>
<td>-</td>
<td>-</td>
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</table>

4.3 Operational Findings

The first full year of operations from the manure processing operation would be expected in 2022. The proposed operation is estimated to generate 10 truck trips and 10 employee trips per day, and 60 total trips per week during operations. It should be noted that the manure drying system would reduce the daily truck trips during operations from 16 trips per day to 10 trips per day. Employee trips will remain the same. As noted earlier, emissions generated by truck trips and employee trips were estimated in separate modeling runs to account for the differences in trip length. Additionally, the model was run for the winter, summer scenarios to determine maximum daily operational emissions during yearly operations.

The expected daily pollutant generation can be calculated utilizing the product of the average daily miles traveled and the expected emissions inventory calculated by EMFAC2014; CALEEMOD 2016.3.2 performs this calculation. The daily pollutants calculated for summer and
winter are shown in Tables 4.2 and 4.3. Based upon these calculations, the proposed project would produce less than significant air quality impacts under CEQA.

Table 4.2: Expected Summer Daily Pollutant Generation

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<th>PM\textsubscript{10}</th>
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<td>0.03</td>
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<tr>
<td>Mobile (Trucks)</td>
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<td>3.17</td>
<td>0.04</td>
<td>1.08</td>
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<tr>
<td>Total (Unmitigated)</td>
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<td>250</td>
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<td>55</td>
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<tr>
<td>Significant?</td>
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<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
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Daily pollutant generation assumes trip distances within CalEEMod. The final numbers are all rounded within Excel and are reported as rounded numbers.

Table 4.3: Expected Winter Daily Pollutant Generation

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</thead>
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<td>Mobile (Employees)</td>
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<tr>
<td>Mobile (Trucks)</td>
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<tr>
<td>Total (Unmitigated)</td>
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</tr>
<tr>
<td>Significant?</td>
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<td>No</td>
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<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

Daily pollutant generation assumes trip distances within CalEEMod. The final numbers are all rounded within Excel and are reported as rounded numbers.

4.4 Cumulative Construction Impacts

Cumulative construction impacts would exist when multiple construction projects occur at the same time and when those construction project maximum exposure contours intersect. To illustrate this, if a project were to produce air quality emissions simultaneous to a nearby construction project the addition of both project emissions could exceed significance thresholds. For this project, the construction emissions are well below significance as shown in Table 4.2 above. If a nearby project was to be under construction at the same time, that project would need to produce significantly more emissions and be relatively close to the
proposed project site. Based on discussions with the project applicant, no known cumulative construction projects have been identified within a ½ mile radius of the project site. Therefore, cumulative construction impacts would be less than significant.

Potential onsite odor generators would include short term construction odors from activities such as Architectural Coating (painting) or perhaps diesel equipment. Construction operations are fairly quick and are not expected to cause significant long-term odor impacts. Therefore, less than significant odor impacts would be expected from construction.

4.5 Cumulative Operations Impacts

The proposed project would improve efficiency as it relates to labor and truck trips compared to the capacity of the chicken farm. The project would decrease overall vehicular trips (estimated reduction in three truck trips and an increase in two employee trips per day) due to the fact that the manure will be dried and densified into pellets which will be utilized as fertilizer. As such, the proposed is consistent with the current A72 (General Agriculture) zoning, per the County’s General Plan, and all operational trips would be accounted for in the General plan. Furthermore, the proposed project would not conflict with the implementation of the RAQS. Given this status, the project would have been considered consistent with the RAQS and SIP. and a less than significant impact would be expected.

Long term odors from the proposed project would be reduced from existing operations since the manure will be processed within a newly constructed 16,200 SF building which would have a ventilation filtration systems included. The filtration system would reduce many odors from chickens but will also filter ammonia a primary odor generating substance from poultry production. Furthermore, placement of the proposed project on the subject site would adhere to the required 1,000-foot setback requirements as outlined under San Diego County Zoning Ordinance Section 6902, Animal Waste Processing Setback. Since the operations are allowed by right and since the project would be consistent with Ordinance Section 6902, the project would not generate adverse impacts to include odor. The project would continue to be required to comply with APCD’s nuisance regulations throughout the project’s lifetime. Given this, less than significant long-term odor impact would be expected. It should be noted that the onsite uses (offices, dwelling units, etc.) would be exempt from these setback requirements as this home is part of the overall operations.

Given that the project’s emissions are below the significance thresholds, a significant cumulative impact would not result, and the proposed project’s contribution to such an impact would be less than cumulatively considerable.
4.6 Conclusion of Findings

All construction phases of the proposed project are anticipated to start in the summer of 2020 and be completed early 2021. The project was found to have significant health risk impacts from diesel exhaust during construction without the use of at least Tier 3 or better diesel equipment fitted with DPF. In accordance with SDAPCD Rule 20.2, the project would implement T-BACT equipment (Tier 3 or better) to reduce the cancer risk to a less than significant level. Based upon the analysis of construction activities, no criteria pollutant impacts would be expected. No further mitigation requirements will be necessary beyond Tiering requirements discussed above. Therefore, construction impacts to sensitive receptors would result in less than significant.

Potential onsite odor generators would include short term construction odors from activities such as Architectural Coating (painting) or perhaps diesel equipment. Construction operations are fairly quick and are not expected to cause significant long-term odor impacts. Therefore, less than significant odor impacts would be expected from construction.

Long term odors from the proposed project would be reduced from existing operations since the manure will be processed within a newly constructed 16,200 SF building which would have a ventilation filtration systems included. The filtration system would reduce many odors from chickens but will also filter ammonia a primary odor generating substance from poultry production. Furthermore, placement of the proposed project on the subject site would adhere to the required 1,000-foot setback requirements as outlined under San Diego County Zoning Ordinance Section 6902, Animal Waste Processing Setback. Since the operations are allowed by right and since the project would be consistent with Ordinance Section 6902, the project would not generate adverse impacts to include odor. Given this, less than significant long-term odor impact would be expected. It should be noted that the onsite uses (offices, dwelling units, etc.) would be exempt from these setback requirements as this home is part of the overall operations.

As the project site is consistent with the General Plan Category and zoning (A72- General Agriculture) for the site, the proposed project was accounted for in the County’s General plan. Furthermore, no cumulative operation impacts are anticipated since the proposed project is consistent with the RAQS and SIP. Therefore, the project would result in less than significant air quality impacts.
5.0 REFERENCES


6.0 CERTIFICATIONS

The contents of this report represent an accurate depiction of the air quality environment and impacts within and surrounding the proposed development. The report was prepared by Jeremy Louden; a County approved CEQA Consultant for Air Quality.

Jeremy Louden, Principal
Ldn Consulting, Inc.
jlouden@ldnconsulting.net
760-473-1253

Date October 13, 2021
ATTACHMENT A

CALEEMOD 2016.3.2
1.0 Project Characteristics

1.1 Land Usage

<table>
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<tr>
<th>Land Uses</th>
<th>Size</th>
<th>Metric</th>
<th>Lot Acreage</th>
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</table>

1.2 Other Project Characteristics

Urbanization: Rural  
Wind Speed (m/s): 2.6  
Precipitation Freq (Days): 40  
Climate Zone: 13  
Operational Year: 2022  
Utility Company: San Diego Gas & Electric

CO2 Intensity (lb/MWhr): 495.89  
CH4 Intensity (lb/MWhr): 0.02  
N2O Intensity (lb/MWhr): 0.004

1.3 User Entered Comments & Non-Default Data
Project Characteristics - 2022 RPS
Land Use - Project is 3.32 acre footprint
Construction Phase - Building construction provided by the project developer
Off-road Equipment -
Off-road Equipment -
Off-road Equipment - ce
Off-road Equipment - ce
Trips and VMT - Assumes additional hauling trips for water during earthwork activities
Grading - The project would import roughly 800 CY of DG
Architectural Coating - Rule 67 paints
Vehicle Trips - Project proposed trips from 5 trucks per day or 10 trips total (No trips on Sunday) Usr Def Indus.; In addition, the project would truck water onsite at 2 trucks per week to Ramona Water District 15 miles away...assumed 20 miles one way (User Def Com.)
Vehicle Emission Factors -
Vehicle Emission Factors -
Vehicle Emission Factors -
Energy Use - Project would utilize 3.75 kw motors continuously at 80% optimal load for 16 hours per day 365 days per year. 75kw*.80*16 hrs/day*365 days * 3 Units = 1,051,200 kWh. Lighting is 3.2*16*365 = 18688
Water And Wastewater - The Project would require 400000 gallons of water
Solid Waste - The project would not generate a significant amount of solid waste each year beyond current operations. The project would create a fertilizer product
Construction Off-road Equipment Mitigation - Tier 3 Mitigation
Fleet Mix - Assume Employee Trips as LDT2 worst case and all truck trips are HHD worst case and are applied to user defined industrial. Assume all water trucks are HHD and are applied to User Defined Commercial

CalEEMod Version: CalEEMod.2016.3.2
Date: 10/13/2021 4:09 PM

Demler Egg Farm Manure Processing - San Diego County, Summer

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### Mitigated Construction

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### Percent Reduction

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3.0 Construction Detail

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Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 4

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 24,300; Non-Residential Outdoor: 8,100; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment
3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment
Use DPF for Construction Equipment
### 3.2 Site Preparation - 2021

#### Unmitigated Construction On-Site

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#### Unmitigated Construction Off-Site

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### 3.2 Site Preparation - 2021

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### 3.3 Grading - 2021

#### Mitigated Construction On-Site

| Category         | 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   |
|------------------|-------|-------|-------|-------|---------------|--------------|------------|----------------|---------------|------------|------------|------------|-----------|-----------|-------|-------|-------|
| Fugitive Dust    |       |       |       |       | 6.5629        | 0.0000       | 6.5629     | 3.3691         | 0.0000       | 3.3691     | 0.0000     | 0.0000     | 0.0000    |           |       |       |       |
| Off-Road         | 0.5233| 10.6486| 12.7305| 0.0214| 0.0773       | 0.0773       | 0.0773     | 0.0773       | 0.0773       | 0.0773     | 0.0000     | 2.070.836 | 5        | 0.6698   | 2.087.580| 2     |
| **Total**        | 0.5233| 10.6486| 12.7305| 0.0214| 6.5629       | 0.0773       | 6.6402     | 3.3691         | 0.0773       | 3.4464     | 0.0000     | 2.070.836 | 5        | 0.6698   | 2.087.580| 2     |

### Mitigated Construction Off-Site

| Category         | 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   |
|------------------|-------|-------|-------|-------|---------------|--------------|------------|----------------|---------------|------------|------------|------------|-----------|-----------|-------|-------|-------|
| Hauling          | 0.0844| 2.9158| 0.7133| 8.770e- 003| 0.1988       | 8.900e- 003 | 0.2077     | 0.0545         | 8.510e- 003 | 0.0630     | 961.9613   | 961.9613  | 0.0850    | 964.0857|
| 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    |
| Worker           | 0.0480| 0.0334| 0.3908| 1.2600e- 003| 0.1277      | 8.500e- 004 | 0.1286     | 0.0339         | 7.800e- 004 | 0.0347     | 125.4486   | 125.4486  | 3.4900e- 003 | 125.5359|
| **Total**        | 0.1325| 2.9492| 1.1041| 0.0100 | 0.3265       | 9.7500e- 003| 0.3362     | 0.0883         | 9.2900e- 003| 0.0976     | 1,087.410  | 1,087.410 | 0.0885    | 1,089.621|
### 3.4 Building Construction - 2021

#### Unmitigated Construction On-Site

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#### Unmitigated Construction Off-Site

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### 3.4 Building Construction - 2021

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### Unmitigated Construction Off-Site

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<th>Exhaust PM10</th>
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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
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<th>NBio-CO2</th>
<th>Total CO2</th>
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<th>N2O</th>
<th>CO2e</th>
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### 3.5 Architectural Coating - 2021

#### Mitigated Construction On-Site

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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
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#### Mitigated Construction Off-Site

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<th>Exhaust PM10</th>
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<th>NBio- CO2</th>
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<tr>
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<td>0.0000</td>
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<td></td>
</tr>
<tr>
<td>Worker</td>
<td>4.8000e-003</td>
<td>3.3400e-003</td>
<td>0.0391</td>
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### 4.0 Operational Detail - Mobile
4.1 Mitigation Measures Mobile

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<tr>
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<th>lb/day</th>
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4.2 Trip Summary Information

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<th>Average Daily Trip Rate</th>
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<td></td>
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<td>Sunday</td>
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<td>User Defined Commercial</td>
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<tr>
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4.3 Trip Type Information

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<th>Trip Purpose %</th>
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<td>H-S or C-C</td>
<td>H-O or C-NW</td>
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4.4 Fleet Mix
5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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<th>Category</th>
<th>ROG</th>
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<th>CO</th>
<th>SO2</th>
<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM10</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio-CO2</th>
<th>NBio-CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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</thead>
<tbody>
<tr>
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### 5.2 Energy by Land Use - Natural Gas

#### Unmitigated

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<th>Exhaust PM10</th>
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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
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<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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</thead>
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#### Mitigated

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<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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### 6.0 Area Detail

### 6.1 Mitigation Measures Area
### 6.2 Area by SubCategory

#### Unmitigated

<table>
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<th>Exhaust PM2.5</th>
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<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
</tr>
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### 6.2 Area by SubCategory

**Mitigated**

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### 7.0 Water Detail

#### 7.1 Mitigation Measures Water

### 8.0 Waste Detail

#### 8.1 Mitigation Measures Waste

### 9.0 Operational Offroad

#### 10.0 Stationary Equipment

*Fire Pumps and Emergency Generators*
### Boilers

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### User Defined Equipment

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#### 11.0 Vegetation
1.0 Project Characteristics

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1.3 User Entered Comments & Non-Default Data
Project Characteristics - 2022 RPS

Land Use - Project is 3.32 acre footprint

Construction Phase - Building Constructon provided by the project developer

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Trips and VMT - Assumes additional hauling trips for water during earthwork activities

Grading - The project would import roughly 800 CY of DG

Architectural Coating - Rule 67 paints

Vehicle Trips - Project proposed trips from 5 trucks per day or 10 trips total (No trips on Sunday) Usr Def Indus.; In addition the project would truck water onsite at 2 trucks per week to Ramona Water District 15 miles away...assumed 20 miles one way (User Def Com.)

Vehicle Emission Factors -

Vehicle Emission Factors -

Vehicle Emission Factors -

Energy Use - Project would utilize 3.75 kw motors continuously at 80% optimal load for 16 hours per day 365 days per year. 75kw*.80*16 hrs/day*365days * 3 Units = 1,051,200 kWh. Lighting is 3.2*16*365 = 18688

Water And Wastewater - The Project would require 400000 gallons of water

Solid Waste - The project would not generate a significant amount of solid waste each year beyond current operations. The project would create a fertilizer product

Construction Off-road Equipment Mitigation - Tier 3 Mitigation

Fleet Mix - Assume Employee Trips as LDT2 worst case and all truck trips are HHD worst case and are applied to user defined industrial. Assume all water trucks are HHD and are applied to User Defined Commercial

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### 2.2 Overall Operational

#### Unmitigated Operational

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#### Mitigated Operational

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3.0 Construction Detail

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**Acres of Grading (Site Preparation Phase):** 0

**Acres of Grading (Grading Phase):** 4

**Acres of Paving:** 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 24,300; Non-Residential Outdoor: 8,100; Striped Parking Area: 0 (Architectural Coating – sqft)

**OffRoad Equipment**
### 3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Use DPF for Construction Equipment

<table>
<thead>
<tr>
<th>Phase Name</th>
<th>Offroad Equipment Type</th>
<th>Amount</th>
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<th>Vendor Trip Length</th>
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**Trips and VMT**

**3.1 Mitigation Measures Construction**

Use Cleaner Engines for Construction Equipment

Use DPF for Construction Equipment
### 3.2 Site Preparation - 2021

#### Unmitigated Construction On-Site

| Category       | 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 |
|----------------|-----|-----|-----|-----|----------------|--------------|------------|----------------|--------------|------------|----------|----------|-----------|---------|-----|-----|------|
| Fugitive Dust  |     |     |     |     | 6.0277         | 0.0000       | 6.0277     | 3.3111         | 0.0000       | 3.3111     | 0.0000   | 0.0000   | 0.0000       |         |     |     |      |
| Off-Road       | 1.4209 | 14.7629 | 8.5583 | 0.0147 | 0.7560 | 0.7560 | 0.6955 | 0.6955 | 1,429.152 | 1,429.152 | 0.4622 | 1,440.707 | 8 |
| Total          | 1.4209 | 14.7629 | 8.5583 | 0.0147 | 6.0277 | 0.7560 | 6.7837 | 3.3111 | 0.6955 | 4.0066 | 1,429.152 | 1,429.152 | 0.4622 | 1,440.707 | 8 |

#### Unmitigated Construction Off-Site

| Category       | 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 |
|----------------|-----|-----|-----|-----|----------------|--------------|------------|----------------|--------------|------------|----------|----------|-----------|---------|-----|-----|------|
| Hauling        | 0.0534 | 1.8098 | 0.4666 | 5.3000e-003 | 0.1223 | 5.5900e-003 | 0.1279 | 0.0335 | 5.3500e-003 | 0.0389 | 581.7485 | 581.7485 | 0.0540 |     | 583.0987 |
| 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         | 0.0446 | 0.0300 | 0.2879 | 9.4000e-004 | 0.1022 | 6.8000e-004 | 0.1029 | 0.0271 | 6.3000e-004 | 0.0277 | 94.1703 | 94.1703 | 2.6100e-003 | 94.2357 |
| Total          | 0.0980 | 1.8398 | 0.7545 | 6.2400e-003 | 0.2245 | 6.2700e-003 | 0.2308 | 0.0606 | 5.9800e-003 | 0.0666 | 675.9188 | 675.9188 | 0.0566 |     | 677.3344 |
### 3.2 Site Preparation - 2021

#### Mitigated Construction On-Site

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#### Mitigated Construction Off-Site

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### 3.3 Grading - 2021

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**Unmitigated Construction Off-Site**

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## 3.3 Grading - 2021

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### 3.4 Building Construction - 2021

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**Unmitigated Construction Off-Site**

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### 3.4 Building Construction - 2021

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#### Mitigated Construction Off-Site

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### 3.5 Architectural Coating - 2021

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#### Unmitigated Construction Off-Site

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### 3.5 Architectural Coating - 2021

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#### Mitigated Construction Off-Site

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<th>SO2</th>
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<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
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<th>CO2e</th>
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### 4.0 Operational Detail - Mobile
4.1 Mitigation Measures Mobile

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<tr>
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<th>Exhaust PM10</th>
<th>PM10 Total</th>
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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio-CO2</th>
<th>NBio-CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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<tr>
<td>Mitigated</td>
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4.2 Trip Summary Information

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4.3 Trip Type Information

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<th>Trip Purpose %</th>
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<td>H-S or C-C</td>
<td>H-O or C-NW</td>
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4.4 Fleet Mix
## 5.0 Energy Detail

**Historical Energy Use:** N

### 5.1 Mitigation Measures Energy

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<th>Exhaust PM10</th>
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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio-CO2</th>
<th>NBio-CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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<tbody>
<tr>
<td>Natural Gas Mitigated</td>
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## 5.2 Energy by Land Use - NaturalGas

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### Mitigated

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<th>SO2</th>
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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
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</table>

## 6.0 Area Detail

### 6.1 Mitigation Measures Area
### 6.2 Area by SubCategory

**Unmitigated**

| SubCategory   | 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  |
|---------------|------|------|------|------|---------------|--------------|------------|---------------|--------------|------------|------------|------------|------------|----------|-------|-------|-------|
| Architectural | 0.1029 |      |      |      |               |              |            |               |              |            |            |            |           |         |       |       |
| Coating       | 0.3467 |      |      |      |               |              |            |               |              |            |            |            |           |         |       |       |
| Consumer      |       |      |      |      |               |              |            |               |              |            |            |            |           |         |       |       |
| Products      |       |      |      |      |               |              |            |               |              |            |            |            |           |         |       |       |
| Landscaping   | 2.0000e-005 | 0.0000 | 2.0000e-004 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 4.4000e-004 | 4.4000e-004 | 0.0000 | 4.7000e-004 |       |       |       |       |
| Total         | 0.4496 | 0.0000 | 2.0000e-004 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 4.4000e-004 | 4.4000e-004 | 0.0000 | 4.7000e-004 |       |       |       |       |
### 6.2 Area by SubCategory

#### Mitigated

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### 7.0 Water Detail

#### 7.1 Mitigation Measures Water

### 8.0 Waste Detail

#### 8.1 Mitigation Measures Waste

### 9.0 Operational Offroad

<table>
<thead>
<tr>
<th>Equipment Type</th>
<th>Number</th>
<th>Hours/Day</th>
<th>Days/Year</th>
<th>Horse Power</th>
<th>Load Factor</th>
<th>Fuel Type</th>
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### 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**
### Boilers

<table>
<thead>
<tr>
<th>Equipment Type</th>
<th>Number</th>
<th>Heat Input/Day</th>
<th>Heat Input/Year</th>
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### User Defined Equipment

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### 11.0 Vegetation
1.0 Project Characteristics

1.1 Land Usage

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<th>Land Uses</th>
<th>Size</th>
<th>Metric</th>
<th>Lot Acreage</th>
<th>Floor Surface Area</th>
<th>Population</th>
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1.2 Other Project Characteristics

Urbanization: Rural  
Climate Zone: 13  
Wind Speed (m/s): 2.6  
Precipitation Freq (Days): 40  
Operational Year: 2022  
Utility Company: San Diego Gas & Electric

<table>
<thead>
<tr>
<th>CO2 Intensity (lb/MWhr)</th>
<th>CH4 Intensity (lb/MWhr)</th>
<th>N2O Intensity (lb/MWhr)</th>
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<tbody>
<tr>
<td>495.89</td>
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</table>

1.3 User Entered Comments & Non-Default Data
Project Characteristics - 2022 RPS
Land Use - Project is 3.32 acre footprint
Construction Phase - Building Construction provided by the project developer
Off-road Equipment -
Off-road Equipment -
Off-road Equipment - ce
Off-road Equipment - ce
Trips and VMT - Assumes additional hauling trips for water during earthwork activities
Grading - The project would import roughly 800 CY of DG
Architectural Coating - Rule 67 paints
Vehicle Trips - Project proposed trips from 5 trucks per day or 10 trips total (No trips on Sunday) Usr Def Indus.; In addition the project would truck water onsite at 2 trucks per week to Ramona Water District 15 miles away...assumed 20 miles one way (User Def Com.)
Vehicle Emission Factors -
Vehicle Emission Factors -
Vehicle Emission Factors -
Energy Use - Project would utilize 3.75 kw motors continuously at 80% optimal load for 16 hours per day 365 days per year. 75kw*.80*16 hrs/day*365 days * 3 Units = 1,051,200 kWh. Lighting is 3.2*16*365 = 18688
Water And Wastewater - The Project would require 400000 gallons of water
Solid Waste - The project would not generate a significant amount of solid waste each year beyond current operations. The project would create a fertilizer product
Construction Off-road Equipment Mitigation - Tier 3 Mitigation
Fleet Mix - Assume Employee Trips as LDT2 worst case and all truck trips are HHD worst case and are applied to user defined industrial. Assume all water trucks are HHD and are applied to User Defined Commercial

<table>
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2.2 Overall Operational

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### 3.0 Construction Detail

**Construction Phase**
### Phase Table

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<th>Num Days</th>
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<td>2</td>
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**Acres**

- **Acres of Grading (Site Preparation Phase): 0**
- **Acres of Grading (Grading Phase): 4**
- **Acres of Paving: 0**

**Residential**

- Indoor: 0
- Outdoor: 0
- Non-Residential Indoor: 24,300
- Non-Residential Outdoor: 8,100
- Striped Parking Area: 0

**OffRoad Equipment**

<table>
<thead>
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<th>Phase Name</th>
<th>Offroad Equipment Type</th>
<th>Amount</th>
<th>Usage Hours</th>
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**Trips and VMT**
3.2 Site Preparation - 2021

**Unmitigated Construction On-Site**

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<th>Category</th>
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<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fugitive Dust</td>
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<td>0.0000</td>
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<td></td>
</tr>
<tr>
<td>Off-Road</td>
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<td>0.0214</td>
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<td>Total</td>
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3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment
Use DPF for Construction Equipment
### 3.2 Site Preparation - 2021

#### Unmitigated Construction Off-Site

<table>
<thead>
<tr>
<th>Category</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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<tbody>
<tr>
<td>Hauling</td>
<td>1.3000e-004</td>
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<td>1.1300e-003</td>
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#### Mitigated Construction On-Site

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<th>SO2</th>
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<th>Exhaust PM10</th>
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<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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<tr>
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### 3.2 Site Preparation - 2021

#### Mitigated Construction Off-Site

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<th>NOx (MT/yr)</th>
<th>CO (tons/yr)</th>
<th>SO2 (tons/yr)</th>
<th>Fugitive Dust (tons/yr)</th>
<th>PM10 Total (tons/yr)</th>
<th>Exhaust PM10 (tons/yr)</th>
<th>PM10 Total (tons/yr)</th>
<th>Fugitive Dust (tons/yr)</th>
<th>PM2.5 Total (tons/yr)</th>
<th>Exhaust PM2.5 (tons/yr)</th>
<th>PM2.5 Total (tons/yr)</th>
<th>Bio-CO2 (tons/yr)</th>
<th>NBio-CO2 (tons/yr)</th>
<th>Total CO2 (tons/yr)</th>
<th>CH4 (MT/yr)</th>
<th>N2O (tons/yr)</th>
<th>CO2e (tons/yr)</th>
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</thead>
<tbody>
<tr>
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<td>4.5700e-003</td>
<td>1.1300e-003</td>
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### 3.3 Grading - 2021

#### Unmitigated Construction On-Site

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<th>NOx (MT/yr)</th>
<th>CO (tons/yr)</th>
<th>SO2 (tons/yr)</th>
<th>Fugitive Dust (tons/yr)</th>
<th>PM10 Total (tons/yr)</th>
<th>Exhaust PM10 (tons/yr)</th>
<th>PM10 Total (tons/yr)</th>
<th>Fugitive Dust (tons/yr)</th>
<th>PM2.5 Total (tons/yr)</th>
<th>Exhaust PM2.5 (tons/yr)</th>
<th>PM2.5 Total (tons/yr)</th>
<th>Bio-CO2 (tons/yr)</th>
<th>NBio-CO2 (tons/yr)</th>
<th>Total CO2 (tons/yr)</th>
<th>CH4 (MT/yr)</th>
<th>N2O (tons/yr)</th>
<th>CO2e (tons/yr)</th>
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</thead>
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<tr>
<td>Fugitive Dust</td>
<td>7.5000e-003</td>
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<td>0.0413</td>
<td>9.0000e-005</td>
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<td>0.0030</td>
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<tr>
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</tbody>
</table>
### 3.3 Grading - 2021

#### Unmitigated Construction Off-Site

| Category      | 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 |
|---------------|-----|------|------|-----|----------------|---------------|-------------|----------------|----------------|-------------|-----------|----------|-----------|-----------|-----|-----|------|
| Hauling       | 3.4000e-004 | 0.0119 | 2.9300e-003 | 3.0000e-005 | 7.8000e-004 | 4.0000e-005 | 8.1000e-004 | 2.1000e-004 | 3.0000e-005 | 2.5000e-004 | 0.0000    | 3.4654    | 3.4654    | 3.1000e-004 | 0.0000 | 3.4732 |
| 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 | 0.0000 |
| Worker        | 2.0000e-004 | 0.0119 | 2.9300e-003 | 3.0000e-005 | 7.8000e-004 | 4.0000e-005 | 8.1000e-004 | 2.1000e-004 | 3.0000e-005 | 2.5000e-004 | 0.0000    | 3.4654    | 3.4654    | 3.1000e-004 | 0.0000 | 3.4732 |
| Total         | 5.4000e-004 | 0.0120 | 4.3800e-003 | 3.0000e-005 | 1.2800e-003 | 4.0000e-005 | 1.3100e-003 | 3.4000e-004 | 3.0000e-005 | 3.9000e-004 | 0.0000    | 3.8968    | 3.8968    | 3.2000e-004 | 0.0000 | 3.9050 |

#### Mitigated Construction On-Site

| Category      | 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 |
|---------------|-----|------|------|-----|----------------|---------------|-------------|----------------|----------------|-------------|-----------|----------|-----------|-----------|-----|-----|------|
| Fugitive Dust | 0.0000  | 0.0000 | 0.0000 | 0.0000 | 0.0263 | 0.0263 | 0.0135 | 0.0000 | 0.0135 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road      | 2.0900e-003 | 0.0426 | 0.0509 | 9.0000e-005 | 3.1000e-004 | 3.1000e-004 | 3.1000e-004 | 3.1000e-004 | 3.1000e-004 | 0.0000 | 7.5145    | 7.5145    | 2.4300e-003 | 0.0000 | 7.5753 |
| Total         | 2.0900e-003 | 0.0426 | 0.0509 | 9.0000e-005 | 3.1000e-004 | 3.1000e-004 | 3.1000e-004 | 3.1000e-004 | 3.1000e-004 | 0.0000 | 7.5145    | 7.5145    | 2.4300e-003 | 0.0000 | 7.5753 |
### 3.3 Grading - 2021

**Mitigated Construction Off-Site**

<table>
<thead>
<tr>
<th>Category</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
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<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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<tbody>
<tr>
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### 3.4 Building Construction - 2021

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### 3.4 Building Construction - 2021

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### 3.4 Building Construction - 2021

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### 3.5 Architectural Coating - 2021

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### 3.5 Architectural Coating - 2021

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#### Mitigated Construction On-Site

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### 3.5 Architectural Coating - 2021

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### 4.3 Trip Type Information

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<td>H-O or C-NW</td>
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### 4.4 Fleet Mix

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5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio-CO2</th>
<th>NBio-CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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### 5.2 Energy by Land Use - Natural Gas

#### Unmitigated

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<th>Exhaust PM10</th>
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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
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<th>CO2e</th>
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#### Mitigated

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<th>Exhaust PM10</th>
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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
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<th>CO2e</th>
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## 5.3 Energy by Land Use - Electricity

### Unmitigated

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<th>N2O MT/yr</th>
<th>CO2e MT/yr</th>
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### Mitigated

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<th>Electricity Use kWh/yr</th>
<th>Total CO2 MT/yr</th>
<th>CH4 MT/yr</th>
<th>N2O MT/yr</th>
<th>CO2e MT/yr</th>
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## 6.0 Area Detail

### 6.1 Mitigation Measures Area
### 6.2 Area by SubCategory

#### Unmitigated

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<th>ROG</th>
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<th>SO2</th>
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<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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6.2 Area by SubCategory

Mitigated

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<th>Exhaust PM10</th>
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<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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7.0 Water Detail

7.1 Mitigation Measures Water
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### 7.2 Water by Land Use

#### Unmitigated

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7.2 Water by Land Use

Mitigated

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8.0 Waste Detail

8.1 Mitigation Measures Waste

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### 8.2 Waste by Land Use

#### Unmitigated

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#### Mitigated

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<th>N2O</th>
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### 9.0 Operational Offroad

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

#### Fire Pumps and Emergency Generators

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#### Boilers

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#### User Defined Equipment

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### 11.0 Vegetation
1.0 Project Characteristics

1.1 Land Usage

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1.2 Other Project Characteristics

**Urbanization**: Rural  
**Wind Speed (m/s)**: 2.6  
**Precipitation Freq (Days)**: 40

**Climate Zone**: 13  
**Operational Year**: 2022

**Utility Company**: San Diego Gas & Electric

**CO2 Intensity (lb/MWhr)**: 495.89  
**CH4 Intensity (lb/MWhr)**: 0.02  
**N2O Intensity (lb/MWhr)**: 0.004

1.3 User Entered Comments & Non-Default Data
Project Characteristics - 2022 RPS
Land Use - Project is 3.32 acre footprint
Construction Phase - Building Construction provided by the project developer
Off-road Equipment -
Off-road Equipment -
Off-road Equipment - ce
Off-road Equipment - ce
Trips and VMT -
Grading - The project would import roughly 800 CY of DG
Architectural Coating - Rule 67 paints
Vehicle Trips - Project employee trips from 5 employees (No trips on Sunday)
Vehicle Emission Factors -
Vehicle Emission Factors -
Vehicle Emission Factors -
Energy Use - Project would utilize 3 75 kw motors continuously at 80% optimal load for 16 hours per day 365 days per year. 75kw*.80*16 hrs/day*365 days = 1,051,200 kWH. Lighting is 3.2*16*365 = 18688
Water And Wastewater - The Project would require 400000 gallons of water
Solid Waste - The project would not generate a significant amount of solid waste each year beyond current operations. The project would create a fertilizer product
Construction Off-road Equipment Mitigation - Tier 3 Mitigation
Fleet Mix - Assume Employee Trips as LDT2 worst case and all truck trips are HHD worst case

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Demler Egg Farm Manure Processing with employee trips only - San Diego County, Summer

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2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio-CO2</th>
<th>NBio-CO2</th>
<th>Total CO2</th>
<th>CH4</th>
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**Mitigated Construction**

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**Percent Reduction**

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### 2.2 Overall Operational

#### Unmitigated Operational

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<th>Bio- CO2</th>
<th>NBio- CO2</th>
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#### Mitigated Operational

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3.0 Construction Detail

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**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0**

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 24,300; Non-Residential Outdoor: 8,100; Striped Parking Area: 0

(Architectural Coating – sqft)

### OffRoad Equipment
3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Use DPF for Construction Equipment
### 3.2 Site Preparation - 2021

#### Unmitigated Construction On-Site

| Category          | 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 |
|-------------------|-----|-----|-----|-----|---------------|--------------|------------|---------------|--------------|------------|----------|----------|----------|--------|-----|-----|------|
| Fugitive Dust     |     |     |     |     | 6.0277        | 0.0000       | 6.0277     | 3.3111        | 0.0000       | 3.3111     | 0.0000   | 0.0000   | 0.0000   |       |     |     |      |
| Off-Road          | 1.4209 | 14.7629 | 8.5583 | 0.0147 | 0.7560 | 0.7560 | 0.6955 | 0.6955 | 1,429.152 | 3 | 1,429.152 | 3 | 0.4622 | 1,440.707 | 8 |
| Total             | 1.4209 | 14.7629 | 8.5583 | 0.0147 | 6.0277 | 0.7560 | 6.7837 | 3.3111 | 0.6955 | 4.0066 | 1,429.152 | 3 | 1,429.152 | 3 | 0.4622 | 1,440.707 | 8 |

#### Unmitigated Construction Off-Site

| Category | 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 |
|----------|-------|-------|------|-----|---------------|--------------|------------|---------------|--------------|------------|----------|----------|----------|--------|-----|-----|------|
| Hauling  | 0.0371 | 1.2817 | 0.3136 | 3.8660e-003 | 0.0874 | 3.9100e-003 | 0.0913 | 0.0239 | 3.7400e-003 | 0.0277 | 422.8401 | 422.8401 | 0.0374 | 423.7739 |
| 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 |       |     |     |      |
| Worker   | 0.0384 | 0.0267 | 0.3126 | 1.0100e-003 | 0.1022 | 6.8000e-004 | 0.1029 | 0.0271 | 6.3000e-004 | 0.0277 | 100.3589 | 100.3589 | 2.7900e-003 | 100.4287 |
| Total    | 0.0755 | 1.3084 | 0.6262 | 4.8700e-003 | 0.1896 | 4.5900e-003 | 0.1941 | 0.0510 | 4.3700e-003 | 0.0554 | 523.1990 | 523.1990 | 0.0401 | 524.2027 |
### 3.2 Site Preparation - 2021

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## 3.3 Grading - 2021

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### 3.3 Grading - 2021

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### 3.4 Building Construction - 2021

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#### Unmitigated Construction Off-Site

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<th>SO2</th>
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<th>Exhaust PM10</th>
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<th>N2O</th>
<th>CO2e</th>
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### 3.4 Building Construction - 2021

#### Mitigated Construction On-Site

| Category    | 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 |
|-------------|--------|--------|--------|--------|---------------|--------------|------------|---------------|--------------|------------|-----------|----------|----------|----------|-----|-----|------|
| Off-Road    | 0.6739 | 14.2261| 17.8738| 0.0269 | 0.1355        | 0.1355       | 0.1355     | 0.1355        | 0.1355       | 0.1355     | 0.0000    | 2.553.363 | 9        | 0.6160   | 2.568.764 |
| Total       | 0.6739 | 14.2261| 17.8738| 0.0269 | 0.1355        | 0.1355       | 0.1355     | 0.1355        | 0.1355       | 0.1355     | 0.0000    | 2.553.363 | 9        | 0.6160   | 2.568.764 |

#### Mitigated Construction Off-Site

| Category    | 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 |
|-------------|--------|--------|--------|--------|---------------|--------------|------------|---------------|--------------|------------|-----------|----------|----------|----------|-----|-----|------|
| 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      | 8.5800e-003 | 0.2934 | 0.0741 | 7.5000e-004 | 0.0184 | 5.9000e-004 | 0.0190 | 5.2900e-003 | 5.6000e-004 | 5.8500e-003 | 80.7694 | 80.7694 | 5.9400e-003 | 80.9178 |
| Worker      | 0.0336 | 0.0234 | 0.2735 | 8.8000e-004 | 0.0894 | 5.9000e-004 | 0.0900 | 0.0237 | 5.5000e-004 | 0.0243 | 87.8140 | 87.8140 | 2.4400e-003 | 87.8751 |
| Total       | 0.0422 | 0.3168 | 0.3477 | 1.6300e-003 | 0.1078 | 1.1800e-003 | 0.1090 | 0.0290 | 1.1100e-003 | 0.0301 | 166.5834 | 168.5834 | 8.3800e-003 | 168.7929 |
### 3.5 Architectural Coating - 2021

#### Unmitigated Construction On-Site

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<th>SO2</th>
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<th>Exhaust PM10</th>
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<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
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<th>NBio-CO2</th>
<th>Total CO2</th>
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<th>CO2e</th>
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<td>0.0941</td>
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<td>0.0941</td>
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<td>281.4481</td>
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<td>281.9309</td>
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<tr>
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<td>0.0941</td>
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<td>281.4481</td>
<td>0.0193</td>
<td>281.9309</td>
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#### Unmitigated Construction Off-Site

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<th>CO</th>
<th>SO2</th>
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<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
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<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
</tr>
<tr>
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<td>8.0000e-005</td>
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<td>3.3900e-003</td>
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<td>12.5449</td>
<td>3.5000e-004</td>
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<tr>
<td><strong>Total</strong></td>
<td>4.8000e-003</td>
<td>3.3400e-003</td>
<td>0.0391</td>
<td>1.3000e-004</td>
<td>0.0128</td>
<td>8.0000e-005</td>
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<td>12.5536</td>
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<td></td>
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### 3.5 Architectural Coating - 2021

#### Mitigated Construction On-Site

| Category       | 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 |
|----------------|-------|--------|---------|-------|---------------|--------------|------------|----------------|---------------|------------|----------|----------|----------|--------|-----|------|------|
| Archit. Coating| 8.3430| 0.0000 | 0.0000  | 0.0000| 0.0000        | 0.0000       | 0.0000     | 0.0000         | 0.0000        | 0.0000     | 0.0000   | 0.0000   | 0.0000   |       |     |      |      |
| Off-Road       | 0.0594| 1.3570 | 1.8324  | 2.9700e-003 | 0.0143 | 0.0143       | 0.0143      | 0.0000       | 0.0143        | 0.0143     | 281.4481 | 281.4481 | 0.0193   | 281.9309|
| Total          | 8.4024| 1.3570 | 1.8324  | 2.9700e-003 | 0.0143 | 0.0143       | 0.0143      | 0.0000       | 0.0143        | 0.0143     | 281.4481 | 281.4481 | 0.0193   | 281.9309|

#### Mitigated Construction Off-Site

| Category       | 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 |
|----------------|-------|--------|---------|-------|---------------|--------------|------------|----------------|---------------|------------|----------|----------|----------|--------|-----|------|------|
| 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   |       |     |      |      |
| 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   |       |     |      |      |
| Worker         | 4.8000e-003 | 3.3400e-003 | 0.0391 | 1.3000e-004 | 0.0128 | 8.0000e-005  | 0.0129      | 3.3900e-003  | 8.0000e-005  | 3.4700e-003 | 12.5449  | 12.5449  | 3.5000e-004 | 12.5536|
| Total          | 4.8000e-003 | 3.3400e-003 | 0.0391 | 1.3000e-004 | 0.0128 | 8.0000e-005  | 0.0129      | 3.3900e-003  | 8.0000e-005  | 3.4700e-003 | 12.5449  | 12.5449  | 3.5000e-004 | 12.5536|

### 4.0 Operational Detail - Mobile
4.1 Mitigation Measures Mobile

<table>
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<tr>
<th>Category</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
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<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
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<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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4.2 Trip Summary Information

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4.3 Trip Type Information

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</tr>
<tr>
<td>H-O or C-NW</td>
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</tr>
<tr>
<td>H-W or C-W</td>
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<td></td>
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</tr>
<tr>
<td>H-S or C-C</td>
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<td></td>
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<tr>
<td>H-O or C-NW</td>
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4.4 Fleet Mix

| Land Use                  | LDA     | LDT1    | LDT2    | MDV     | LHD1    | LHD2    | MHD     | HHD     | OBUS    | UBUS    | MCY     | SBUS    | MH      |
|---------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| User Defined Industrial   | 0.598645| 0.040929| 0.181073| 0.106149| 0.015683| 0.005479| 0.016317| 0.023976| 0.001926| 0.001932| 0.006016| 0.000753| 0.001122|
## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

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<th>lb/day</th>
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<td>NaturalGas Unmitigated</td>
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</tbody>
</table>
### 5.2 Energy by Land Use - NaturalGas

#### Unmitigated

| Land Use          | 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 |
|-------------------|----------------|------|-------|-------|------|---------------|--------------|------------|---------------|---------------|------------|-----------|----------|-----------|---------|-----|-----|------|
| User Defined      | 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   | 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   | 0.0000   | 0.0000 |     |     |

#### Mitigated

| Land Use          | 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 |
|-------------------|----------------|------|-------|-------|------|---------------|--------------|------------|---------------|---------------|------------|-----------|----------|-----------|---------|-----|-----|------|
| User Defined      | 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   | 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   | 0.0000   | 0.0000 |     |     |

### 6.0 Area Detail

#### 6.1 Mitigation Measures Area
## 6.2 Area by SubCategory

### Unmitigated

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<th>SO2</th>
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<th>Fugitive PM2.5</th>
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<th>PM2.5 Total</th>
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<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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6.2 Area by SubCategory

### Mitigated

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7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**
### Demler Egg Farm Manure Processing with employee trips only - San Diego County, Summer

#### Boilers

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#### User Defined Equipment

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### 11.0 Vegetation
1.0 Project Characteristics

1.1 Land Usage

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<td>San Diego Gas &amp; Electric</td>
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| CO2 Intensity (lb/MWhr) | 495.89 |
| CH4 Intensity (lb/MWhr) | 0.02   |
| N2O Intensity (lb/MWhr) | 0.004  |

1.3 User Entered Comments & Non-Default Data
Project Characteristics - 2022 RPS

Land Use - Project is 3.32 acre footprint

Construction Phase - Building Construction provided by the project developer

Off-road Equipment -

Off-road Equipment -

Off-road Equipment - ce

Off-road Equipment - ce

Trips and VMT -

Grading - The project would import roughly 800 CY of DG

Architectural Coating - Rule 67 paints

Vehicle Trips - Project employee trips from 5 employees (No trips on Sunday)

Vehicle Emission Factors -

Vehicle Emission Factors -

Vehicle Emission Factors -

Energy Use - Project would utilize 3 75 kw motors continuously at 80% optimal load for 16 hours per day 365 days per year. 75kw*.80*16 hrs/day*365 days * 3 Units = 1,051,200 kWH. Lighting is 3.2*16*365 = 18688

Water And Wastewater - The Project would require 400000 gallons of water

Solid Waste - The project would not generate a significant amount of solid waste each year beyond current operations. The project would create a fertilizer product

Construction Off-road Equipment Mitigation - Tier 3 Mitigation

Fleet Mix - Assume Employee Trips as LDT2 worst case and all truck trips are HHD worst case

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Demler Egg Farm Manure Processing with employee trips only - San Diego County, Winter

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Demler Egg Farm Manure Processing with employee trips only - San Diego County, Winter
## 2.1 Overall Construction (Maximum Daily Emission)

### Unmitigated Construction

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<th>PM2.5 Total</th>
<th>Bio- CO2</th>
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<th>Total CO2</th>
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### Mitigated Construction

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### Percent Reduction

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## 2.2 Overall Operational

### Unmitigated Operational

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### Mitigated Operational

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<th>CO</th>
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3.0 Construction Detail

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**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0**

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 24,300; Non-Residential Outdoor: 8,100; Striped Parking Area: 0 (Architectural Coating – sqft)

**OffRoad Equipment**
3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Use DPF for Construction Equipment

<table>
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<tr>
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3.1.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Use DPF for Construction Equipment
## 3.2 Site Preparation - 2021

### Unmitigated Construction On-Site

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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
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### Unmitigated Construction Off-Site

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### 3.2 Site Preparation - 2021

**Mitigated Construction On-Site**

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**Mitigated Construction Off-Site**

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### 3.3 Grading - 2021

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**Unmitigated Construction Off-Site**

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### 3.4 Building Construction - 2021

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#### Unmitigated Construction Off-Site

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### 3.4 Building Construction - 2021

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### 3.5 Architectural Coating - 2021

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#### Mitigated Construction Off-Site

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### 4.0 Operational Detail - Mobile
### 4.1 Mitigation Measures Mobile

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### 4.2 Trip Summary Information

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CalEEMod Version: CalEEMod.2016.3.2  
Date: 9/10/2020 9:34 AM  
Demler Egg Farm Manure Processing with employee trips only - San Diego County, Winter
5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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<th>SO2</th>
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### 5.2 Energy by Land Use - Natural Gas

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#### Mitigated

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### 6.0 Area Detail

#### 6.1 Mitigation Measures Area
### 6.2 Area by SubCategory

#### Unmitigated

| SubCategory     | 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 |
|-----------------|------|------|------|------|---------------|--------------|------------|---------------|--------------|------------|----------|----------|----------|--------|-----|------|------|
| Architectural Coating | 0.1029 |      |      |      |               |              |            |               |              |            |          |          |          |       |     | 0.0000 |
| Consumer Products | 0.3467 |      |      |      |               |              |            |               |              |            |          |          |          |       |     | 0.0000 |
| Landscaping     | 1.0000e-005 | 0.0000 | 1.0000e-004 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 2.2000e-004 | 2.2000e-004 | 0.0000 |        | 2.3000e-004 |
| Total           | 0.4496 | 0.0000 | 1.0000e-004 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 2.2000e-004 | 2.2000e-004 | 0.0000 |        | 2.3000e-004 |
6.2 Area by SubCategory
Mitigated

| SubCategory               | 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 |
|---------------------------|------|------|------|------|---------------|--------------|------------|---------------|--------------|------------|----------|----------|----------|--------|-----|------|------|
| Architectural Coating     | 0.1029 |   |   |   | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |   |
| Consumer Products         | 0.3467 |   |   |   | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |   |
| Landscaping               | 1.0000E-005 |   | 1.0000E-004 |   | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 2.2000E-004 | 2.2000E-004 | 2.3000E-004 |   |
| Total                     | 0.4496 | 0.0000 | 1.0000E-004 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 2.2000E-004 | 2.2000E-004 | 2.3000E-004 |   |

7.0 Water Detail
7.1 Mitigation Measures Water

8.0 Waste Detail
8.1 Mitigation Measures Waste

9.0 Operational Offroad

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10.0 Stationary Equipment

Fire Pumps and Emergency Generators
### Boilers

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### User Defined Equipment

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### 11.0 Vegetation
1.0 Project Characteristics

1.1 Land Usage

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1.2 Other Project Characteristics

- Urbanization: Rural
- Wind Speed (m/s): 2.6
- Precipitation Freq (Days): 40
- Climate Zone: 13
- Operational Year: 2022
- Utility Company: San Diego Gas & Electric

CO2 Intensity (lb/MWhr): 495.89
CH4 Intensity (lb/MWhr): 0.02
N2O Intensity (lb/MWhr): 0.004

1.3 User Entered Comments & Non-Default Data
Demler Egg Farm Manure Processing with employee trips only - San Diego County, Annual

Project Characteristics - 2022 RPS
Land Use - Project is 3.32 acre footprint
Construction Phase - Building Construction provided by the project developer
Off-road Equipment -
Trips and VMT -
Grading - The project would import roughly 800 CY of DG
Architectural Coating - Rule 67 paints
Vehicle Trips - Project employee trips from 5 employees (No trips on Sunday)
Vehicle Emission Factors -
Energy Use - Project would utilize 3 75 kw motors continuously at 80% optimal load for 16 hours per day 365 days per year. 75kw*.80*16 hrs/day*365days * 3 Units = 1,051,200 kWH. Lighting is 3.2*16*365 = 18688
Water And Wastewater - The Project would require 400000 gallons of water
Solid Waste - The project would not generate a significant amount of solid waste each year beyond current operations. The project would create a fertilizer product
Construction Off-road Equipment Mitigation - Tier 3 Mitigation
Fleet Mix - Assume Employee Trips as LDT2 worst case and all truck trips are HHD worst case

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Demler Egg Farm Manure Processing with employee trips only - San Diego County, Annual
## 2.1 Overall Construction
### Unmitigated Construction

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<th>CO (tons/yr)</th>
<th>SO2 (MT/yr)</th>
<th>Fugitive PM10 (tons/yr)</th>
<th>Exhaust PM10 (MT/yr)</th>
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<th>NBio-CO2 (MT/yr)</th>
<th>Total CO2 (MT/yr)</th>
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### 2.2 Overall Operational

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Demler Egg Farm Manure Processing with employee trips only - San Diego County, Annual
### 2.2 Overall Operational

#### Mitigated Operational

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### 3.0 Construction Detail

#### Construction Phase
# Demler Egg Farm Manure Processing with employee trips only - San Diego County, Annual

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## Trips and VMT

- Residential Indoor: 0
- Residential Outdoor: 0
- Non-Residential Indoor: 24,300
- Non-Residential Outdoor: 8,100
- Striped Parking Area: 0

**Architectural Coating** ± sqft
### 3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment  
Use DPF for Construction Equipment

### 3.2 Site Preparation - 2021

**Unmitigated Construction On-Site**

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Date: 9/10/2020 9:25 AM  
Page 9 of 27  
Demler Egg Farm Manure Processing with employee trips only - San Diego County, Annual
### 3.2 Site Preparation - 2021

#### Unmitigated Construction Off-Site

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### 3.2 Site Preparation - 2021

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### 3.4 Building Construction - 2021

**Unmitigated Construction Off-Site**

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**Mitigated Construction On-Site**

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### 3.4 Building Construction - 2021

#### Mitigated Construction Off-Site

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### 3.5 Architectural Coating - 2021

#### Unmitigated Construction Coating On-Site

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# 3.5 Architectural Coating - 2021

## Unmitigated Construction Off-Site

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<th>N2O</th>
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## Mitigated Construction On-Site

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### 3.5 Architectural Coating - 2021

**Mitigated Construction Off-Site**

| Category     | 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 |
|--------------|------|------|------|------|--------------|--------------|------------|---------------|--------------|------------|----------|----------|----------|----------|-----|-----|------|
| 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       | 4.0000e-005 | 3.0000e-005 | 3.3000e-004 | 0.0000 | 1.1000e-004 | 0.0000     | 1.1000e-004 | 3.0000e-005 | 0.0000     | 3.0000e-005 | 0.0000    | 0.0000    | 0.0000    | 0.0000  | 0.0971| 0.0971|
| Total        | 4.0000e-005 | 3.0000e-005 | 3.3000e-004 | 0.0000 | 1.1000e-004 | 0.0000     | 1.1000e-004 | 3.0000e-005 | 0.0000     | 3.0000e-005 | 0.0000    | 0.0000    | 0.0000    | 0.0000  | 0.0971| 0.0971|

### 4.0 Operational Detail - Mobile

#### 4.1 Mitigation Measures Mobile
### 4.2 Trip Summary Information

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### 5.0 Energy Detail

Historical Energy Use: N
## 5.1 Mitigation Measures Energy

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<th>Exhaust PM10</th>
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<th>Fugitive PM2.5</th>
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<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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<tbody>
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<td>241.4641</td>
</tr>
<tr>
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<td></td>
<td>241.4641</td>
</tr>
<tr>
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</table>

## 5.2 Energy by Land Use - Natural Gas

### Unmitigated

<table>
<thead>
<tr>
<th>Land Use</th>
<th>NaturalGas Use</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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5.2 Energy by Land Use - Natural Gas

**Mitigated**

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<th>SO2</th>
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<th>Exhaust PM10</th>
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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio-CO2</th>
<th>NBio-CO2</th>
<th>Total CO2</th>
<th>CH4</th>
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<th>CO2e</th>
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5.3 Energy by Land Use - Electricity

**Unmitigated**

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<th>Electricity Use</th>
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<td>1.9400e-003</td>
<td>241.4641</td>
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<tr>
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5.3 Energy by Land Use - Electricity

Mitigated

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<th>CO2e</th>
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6.0 Area Detail

6.1 Mitigation Measures Area
### 6.2 Area by SubCategory

#### Unmitigated

<table>
<thead>
<tr>
<th>SubCategory</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
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<th>N2O</th>
<th>CO2e</th>
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### 7.0 Water Detail
### 7.1 Mitigation Measures Water

<table>
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<tr>
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<th>MT/yr</th>
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### 7.2 Water by Land Use

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7.2 Water by Land Use

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8.0 Waste Detail

8.1 Mitigation Measures Waste

**Category/Year**

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</thead>
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### 8.2 Waste by Land Use

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**Mitigated**

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### 9.0 Operational Offroad
### 10.0 Stationary Equipment

#### Fire Pumps and Emergency Generators

<table>
<thead>
<tr>
<th>Equipment Type</th>
<th>Number</th>
<th>Hours/Day</th>
<th>Hours/Year</th>
<th>Horse Power</th>
<th>Load Factor</th>
<th>Fuel Type</th>
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#### Boilers

<table>
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<th>Equipment Type</th>
<th>Number</th>
<th>Heat Input/Day</th>
<th>Heat Input/Year</th>
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#### User Defined Equipment

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<th>Equipment Type</th>
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### 11.0 Vegetation
ATTACHMENT B

AERMOD - Unmitigated
1 AERMOD PRIME - (DATED 18081)

AERMODP+MSPx VERSION
(C) COPYRIGHT 1998-2017, Trinity Consultants

Run Began on 3/17/2019 at 20:53:10

** BREEZE AERMOD
** Trinity Consultants
** VERSION 8.1

CO STARTING
CO TITLEONE Poultry Manure Processing Unmitigated
CO MODELOPT DFAULT CONC NODRYDPLT NOWETDPLT
CO RUNORMOT RUN
CO AVERTIME ANNUAL
CO POLLUTID PM10
CO FINISHED

SO STARTING
SO ELEVUNIT METERS
SO LOCATION WGD3G000 AREAPOLY 521047.7 3659371.1 0
** SRCDESCR Grading Area Source
SO SRCPARAM WGD3G000 3.07E-07 3 14 1
SO AREAVERT WGD3G000 521047.7 3659371.1 521048.5 3659238.9 521043.5 3659203.6 521035.9
3659195.1
SO AREAVERT WGD3G000 521033.4 3659188.4 521054.4 3659185 521094 3659179.1 521115.9
3659178.3
SO AREAVERT WGD3G000 521118.4 3659336.6 521116.7 3659349.2 521110 3659361 521102.4
3659371.1
SO AREAVERT WGD3G000 521092.3 3659372 521047.7 3659371.1
SO SRCGROUP ALL
SO FINISHED

RE STARTING
RE ELEVUNIT METERS
RE DISCCART 520540.5 3658803.6 0 0
** SENSITIV
** RCPDESCR R1
RE DISCCART 520768.7 3658953.7 0 0
** SENSITIV
** RCPDESCR R2
RE DISCCART 520941.7 3658890.9 0 0
** SENSITIV
** RCPDESCR R3
RE DISCCART 521397.2 3659342.6 0 0
** SENSITIV
** RCPDESCR R4
RE DISCCART 521139.4 3659620.2 0 0
** SENSITIV
** RCPDESCR R5
RE DISCCART 521326.1 3659832.9 0 0
** SENSITIV
** RCPDESCR R6
RE FINISHED
** AMPTYPE
** AMPDATUM -1
** AMPZONE -1
** AMPHEMISPHERE

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** PROJECTION UTM
** DATUM WGE
** UNITS METER
** ZONE 11
** HEMISPHERE N
** ORIGINLON 0
** ORIGINLAT 0
** PARALLEL1 0
** PARALLEL2 0
** AZIMUTH 0
** SCALEFACT 0
** FALSEEAST 0
** FALSENORTH 0

** POSTFMT UNFORM
** TEMPLATE USERDEFINED
** AERMODEXE AERMOD_BREEZE_18081_64.EXE
** AERMAPEXE AERMAP_EPA_18081_64.EXE

*** Message Summary For AERMOD Model Setup ***

---------- Summary of Total Messages ----------
A Total of 0 Fatal Error Message(s)
A Total of 3 Warning Message(s)
A Total of 0 Informational Message(s)

******* FATAL ERROR MESSAGES *******
***  NONE  ***

******* WARNING MESSAGES *******
ME W186 63  MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.40
MX W403 63  PFLCNV: Turbulence data is being used w/o ADJ_U* option SigA Data
MX W402 63  PFLCNV: Turbulence data being used with ADJ_U* w/o DFALUT Option

*******************************************************************************
*** SETUP Finishes Successfully ***
*******************************************************************************

*** AERMOD - VERSION 18081 ***  *** Poultry Manure Processing Unmitigated
*** 03/17/19
*** AERMET - VERSION 15181 ***  ***
*** 20:53:10

PAGE 1

*** MODELOPTs:  RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL SigA Data

*** MODEL SETUP OPTIONS SUMMARY ***
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -

**Model Is Setup For Calculation of Average CONCentration Values.

-- DEPOSITION LOGIC --
**NO GAS DEPOSITION Data Provided.
**NO PARTICLE DEPOSITION Data Provided.
**Model Uses NO DRY DEPLETION. DRYDPLT = F
**Model Uses NO WET DEPLETION. WETDPLT = F

**Model Uses RURAL Dispersion Only.

**Model Uses Regulatory DEFAULT Options:
  1. Stack-tip Downwash.
  3. Use Calms Processing Routine.
  4. Use Missing Data Processing Routine.
  5. No Exponential Decay.

**Other Options Specified:
  CCVR_Sub - Meteorological data includes CCVR substitutions
  TEMP_Sub - Meteorological data includes TEMP substitutions
**Model Assumes No FLAGPOLE Receptor Heights.**

**The User Specified a Pollutant Type of: PM10**

**Model Calculates ANNUAL Averages Only**

**This Run Includes: 1 Source(s); 1 Source Group(s); and 6 Receptor(s) with: 0 POINT(s), including 0 POINTCAP(s) and 0 POINTHOR(s) and: 0 VOLUME source(s) and: 1 AREA type source(s) and: 0 LINE source(s) and: 0 OPENPIT source(s) and: 0 BUOYANT LINE source(s) with 0 line(s)**

**Model Set To Continue RUNning After the Setup Testing.**

**The AERMET Input Meteorological Data Version Date: 15181**

**Output Options Selected:**
- Model Outputs Tables of ANNUAL Averages by Receptor

**NOTE: The Following Flags May Appear Following CONC Values:**
- c for Calm Hours
- m for Missing Hours
- b for Both Calm and Missing Hours

**Misc. Inputs:**
- Base Elev. for Pot. Temp. Profile (m MSL) = 0.00
- Decay Coef. = 0.000
- Rot. Angle = 0.0
- Emission Units = GRAMS/SEC
- Emission Rate Unit Factor = 0.10000E+07
- Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.5 MB of RAM.**

**Input Runstream File:** aermod.inp

**Output Print File:** aermod.out

↑ *** AERMOD - VERSION 18081 *** *** Poultry Manure Processing Unmitigated
*** 03/17/19

*** AERMET - VERSION 15181 *** ***
*** 20:53:10

PAGE 2

*** MODELOPTs: RegDFault CONC ELEV NODRYDPLT NOWETDPLT RURAL SigA Data

*** AREAPOLY SOURCE DATA ***

NUMBER EMISSION RATE LOCATION OF AREA BASE RELEASE NUMBER INIT.
URBAN EMISSION RATE
SOURCE PART. (GRAMS/SEC X Y ELEV. HEIGHT OF VERTS. SZ
SOURCE SCALAR VARY
ID CATS. /METER**2) (METERS) (METERS) (METERS) (METERS) (METERS)
BY
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - -
WGD3G000 0 0.30700E-06 521047.7 3659371.1 0.0 3.00 14 1.00
NO

*** AERMOD - VERSION 18081 *** *** Poultry Manure Processing Unmitigated
03/17/19
*** AERMET - VERSION 15181 *** ***
20:53:10

PAGE 3
*** MODELOPTs: RegDFault CONC ELEV NODRYDPLT NOWETDPLT RURAL SigA Data

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID SOURCE IDs
----------- ----------------------
ALL WGD3G000 ,

*** AERMOD - VERSION 18081 *** *** Poultry Manure Processing Unmitigated
03/17/19
*** AERMET - VERSION 15181 *** ***
20:53:10

PAGE 4
*** MODELOPTs: RegDFault CONC ELEV NODRYDPLT NOWETDPLT RURAL SigA Data

*** METEOROLOGICAL DAYS SELECTED FOR PROCESSING

(1=YES; 0=NO)

1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
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NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.
### Upper Bound of First Through Fifth Wind Speed Categories

(METERS/SEC)

1.54, 3.09, 5.14, 8.23, 10.80

#### AERMOD - Version 18081

Poultry Manure Processing Unmitigated
03/17/19

#### AERMET - Version 15181

20:53:10

**Page 5**

**MODELOPTs**: RegDFault Conc Elev NodryDplt NowetDplt Rural SigA Data

*** Up to the First 24 Hours of Meteorological Data ***

**Surface file**: C:\Users\XEONRT\AMAZON~1\LDN\METDAT~1\ESCOND~1\ESCONDIDO-2012-V15181.SFC

**Profile file**: C:\Users\XEONRT\AMAZON~1\LDN\METDAT~1\ESCOND~1\ESCONDIDO-2012-V15181.PFL

**Surface format**: FREE

**Profile format**: FREE

**Surface station no.**: 53120
**Upper air station no.**: 3190

**Name**: UNKNOWN
**Name**: UNKNOWN

**Year**: 2012
**Year**: 2012

**First 24 hours of scalar data**

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<th>YR</th>
<th>MO</th>
<th>DY</th>
<th>JDY</th>
<th>HR</th>
<th>HO</th>
<th>U*</th>
<th>DT/DZ</th>
<th>ZICNV</th>
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<th>BOWEN</th>
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<td>01</td>
<td>01</td>
<td>1</td>
<td>01</td>
<td>-0.6</td>
<td>0.029</td>
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<td>12.</td>
<td>3.3</td>
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</tbody>
</table>
First hour of profile data
YR MO DY HR HEIGHT F  WDIR    WSPD AMB_TMP sigmaA  sigmaW  sigmaV
12 01 01   1   51.    0.44   282.6   30.0  -99.00    0.20

F indicates top of profile (=1) or below (=0)

*** AERMOD - VERSION 18081 *** *** Poultry Manure Processing Unmitigated
*** 03/17/19
*** AERMET - VERSION 15181 *** ***
*** 20:53:10

PAGE 6
*** MODELOPTs:    RegDFault CONC ELEV NODRYDPLT NOWETDPLT RURAL SigA Data

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 1 YEARS
FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): WGD3G000 ,

*** SENSITIVE DISCRETE RECEPTOR POINTS ***

** CONC OF PM10 IN MICROGRAMS/M**3
### THE SUMMARY OF MAXIMUM ANNUAL RESULTS AVERAGED OVER 1 YEARS

**CONC OF PM10 IN MICROGRAMS/M**3

<table>
<thead>
<tr>
<th>GROUP ID</th>
<th>AVERAGE CONC</th>
<th>RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE GRID-ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>ALL</td>
<td>0.24286</td>
<td>0.00, 0.00) SR</td>
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</table>

### RECEPTOR TYPES
- GC = GRIDCART
- GP = GRIDPOLR
- DC = DISCCART
DP = DISCPOLR

*** AERMOD - VERSION 18081 *** *** Poultry Manure Processing Unmitigated
*** 03/17/19
*** AERMET - VERSION 15181 *** ***
*** 20:53:10

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*** MODELOPTs: RegDFault Conc Elev Nodrydplt Nowetdplt Rural SigA Data

*** Message Summary: AERMOD Model Execution ***

------------- Summary of Total Messages ------------

A Total of 0 Fatal Error Message(s)
A Total of 3 Warning Message(s)
A Total of 378 Informational Message(s)

A Total of 8784 Hours Were Processed
A Total of 250 Calm Hours Identified
A Total of 128 Missing Hours Identified (1.46 Percent)

******** FATAL ERROR MESSAGES ********
*** NONE ***

******** WARNING MESSAGES ********

ME W186 63 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.40
MX W403 63 PFLCNV: Turbulence data is being used w/o ADJ_U* option SigA Data
MX W402 63 PFLCNV: Turbulence data being used with ADJ_U* w/o DFAULT Option

********************
*** AERMOD Finishes Successfully ***
********************
ATTACHMENT C

AERMOD - Mitigated
AERMOD PRIME - (DATED 18081)

AERMOD+MSPx VERSION
(C) COPYRIGHT 1998-2017, Trinity Consultants

Run Began on 3/17/2019 at 20:52:00

** BREEZE AERMOD
** Trinity Consultants
** VERSION 8.1

CO STARTING
CO TITLE ONE Poultry Manure Processing Unmitigated
CO MODELOPT DEFAULT CONC NODRYDPLT NOWETDPLT
CO RUNNORT RUN
CO AVERTIME ANNUAL
CO POLLUTID PM10
CO FINISHED

SO STARTING
SO ELEVUNIT METERS
SO LOCATION WGD3G000 AREAPOLY 521047.7 3659371.1 0
** SRCDESCR Grading Area Source
SO SRCPARAM WGD3G000 3.7E-08 3 14 1
SO AREAVERT WGD3G000 521047.7 3659371.1 521048.5 3659238.9 521043.5 3659203.6 521035.9 3659195.1
SO AREAVERT WGD3G000 521033.4 3659188.4 521054.4 3659185 521094 3659179.1 521115.9 3659178.3
SO AREAVERT WGD3G000 521118.4 3659349.2 521110 3659361 521102.4 3659371.1
SO AREAVERT WGD3G000 521092.3 3659372 521047.7 3659371.1
SO SRCGROUP ALL
SO FINISHED

RE STARTING
RE ELEVUNIT METERS
RE DISCCART 520540.5 3658803.6 0 0
** SENSITIV
** RCPDESCR R1
RE DISCCART 520768.7 3658953.7 0 0
** SENSITIV
** RCPDESCR R2
RE DISCCART 520941.7 3658890.9 0 0
** SENSITIV
** RCPDESCR R3
RE DISCCART 521397.2 3659342.6 0 0
** SENSITIV
** RCPDESCR R4
RE DISCCART 521139.4 3659620.2 0 0
** SENSITIV
** RCPDESCR R5
RE DISCCART 521326.1 3659832.9 0 0
** SENSITIV
** RCPDESCR R6
RE FINISHED
A Total of 0 Fatal Error Message(s)
A Total of 3 Warning Message(s)
A Total of 0 Informational Message(s)

******** FATAL ERROR MESSAGES ********
***  NONE  ***

******** WARNING MESSAGES ********
ME W186 63 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.40
MX W403 63 PFLCNV: Turbulence data is being used w/o ADJ_U* option SigA Data
MX W402 63 PFLCNV: Turbulence data being used with ADJ_U* w/o DFAULT Option

*******************************************************************************
*** SETUP Finishes Successfully ***
*******************************************************************************

*** AERMOD - VERSION  18081 ***  ***  Poultry Manure Processing Unmitigated
*** 03/17/19
*** AERMET - VERSION  15181 ***  ***
*** 20:52:00

PAGE 1
*** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  SigA Data
*** MODEL SETUP OPTIONS SUMMARY ***

- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -

**Model Is Setup For Calculation of Average CONCenetration Values.

-- DEPOSITION LOGIC --
**NO GAS DEPOSITION Data Provided.  
**NO PARTICLE DEPOSITION Data Provided.  
**Model Uses NO DRY DEPLETION.  DRYDPLT = F
**Model Uses NO WET DEPLETION.  WETDPLT = F

**Model Uses RURAL Dispersion Only.

**Model Uses Regulatory DEFAULT Options:
1. Stack-tip Downwash.
3. Use Calms Processing Routine.
4. Use Missing Data Processing Routine.
5. No Exponential Decay.

**Other Options Specified:
CCVR_Sub - Meteorological data includes CCVR substitutions
TEMP_Sub - Meteorological data includes TEMP substitutions
**Model Assumes No FLAGPOLE Receptor Heights.**

**The User Specified a Pollutant Type of: PM10**

**Model Calculates ANNUAL Averages Only**

**This Run Includes: 1 Source(s); 1 Source Group(s); and 6 Receptor(s)**

- 0 POINT(s), including 0 POINTCAP(s) and 0 POINTHOR(s)
- 0 VOLUME source(s)
- 1 AREA type source(s)
- 0 LINE source(s)
- 0 OPENPIT source(s)
- 0 BUOYANT LINE source(s) with 0 line(s)

**Model Set To Continue RUNning After the Setup Testing.**

**The AERMET Input Meteorological Data Version Date: 15181**

**Output Options Selected:**
- Model Outputs Tables of ANNUAL Averages by Receptor
- **NOTE:** The Following Flags May Appear Following CONC Values: c for Calm Hours
- m for Missing Hours
- b for Both Calm and Missing Hours

**Misc. Inputs:** Base Elev. for Pot. Temp. Profile (m MSL) = 0.00; Decay Coef. = 0.000; Rot. Angle = 0.0
- Emission Units = GRAMS/SEC
- Emission Rate Unit Factor = 0.10000E+07
- Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.5 MB of RAM.**

**Input Runstream File:** aermod.inp

**Output Print File:** aermod.out

-----

**AERMOD - VERSION 18081 *** Poultry Manure Processing Unmitigated 03/17/19**

**AERMET - VERSION 15181 *** 20:52:00**

**MODELOPTs:** RegDFault CONC ELEV NODRYDPLT NOWETDPLT RURAL SigA Data

**AREAPOLY SOURCE DATA ***

NUMBER EMISSION RATE LOCATION OF AREA BASE RELEASE NUMBER INIT.

URBAN EMISSION RATE
WGD3G000  0  0.37000E-07  521047.7  3659371.1  0.0  3.00  14  1.00

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.
### *** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***

(METERS/SEC)

1.54, 3.09, 5.14, 8.23, 10.80,

▲ *** AERMOD - VERSION 18081 *** *** Poultry Manure Processing Unmitigated

03/17/19

*** AERMET - VERSION 15181 *** ***

20:52:00

PAGE 5

*** MODELOPTs: RegDFault CONC ELEV NODRYDPLT NOWETDPLT RURAL SigA Data

*** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

Surface file: C:\USERS\XEONRT\AMAZON-1\LDN\METDAT-1\ESCOND-1\ESCONDIDO-2012-V15181.SFC

Profile file: C:\USERS\XEONRT\AMAZON-1\LDN\METDAT-1\ESCOND-1\ESCONDIDO-2012-V15181.PFL

Surface format: FREE

Profile format: FREE

Surface station no.: 53120

Upper air station no.: 3190

Name: UNKNOWN

Name: UNKNOWN

Year: 2012

Year: 2012

First 24 hours of scalar data

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<th>W*</th>
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F indicates top of profile (=1) or below (=0)

First hour of profile data

YR MO DY HR HEIGHT F WDIR WSPD AMB_TMP sigmaA sigmaW sigmaV
12 01 01 01 10.0 1 51. 0.44 282.6 30.0 -99.00 0.20

---

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M)
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*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** AERMOD - VERSION 18081 *** *** Poultry Manure Processing Unmitigated *** 03/17/19
*** AERMET - VERSION 15181 *** ***
*** 20:52:00 *** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL SigA Data

*** Message Summary : AERMOD Model Execution ***

---------- Summary of Total Messages ----------
A Total of 0 Fatal Error Message(s)
A Total of 3 Warning Message(s)
A Total of 378 Informational Message(s)
A Total of 8784 Hours Were Processed
A Total of 250 Calm Hours Identified
A Total of 128 Missing Hours Identified (1.46 Percent)

********* FATAL ERROR MESSAGES *********
*** NONE ***

******** WARNNING MESSAGES ********
ME W186  63  MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.40
MX W403  63  PFLCNV: Turbulence data is being used w/o ADJ_U* option SigA Data
MX W402  63  PFLCNV: Turbulence data being used with ADJ_U* w/o DEFAULT Option

******************************************************************************
*** AERMOD Finishes Successfully ***
******************************************************************************
ATTACHMENT D

Construction Health Risk Calculations - Unmitigated and Mitigated
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| Used as an input to AERMOD | Emission Rate over Grading Area (g/s-m^2) | 3.70E-08 |
| From AERMOD | Concentration Annual (Ug/M^3) | 0.02927 |

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</tr>
<tr>
<td>Breathing Rate per agegroup BR/BW (Page 5-25)</td>
<td>361</td>
<td>1090</td>
</tr>
<tr>
<td>A (Default is 1)</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Exposure Frequency = EF (days/365days)</td>
<td>0.96</td>
<td>0.96</td>
</tr>
<tr>
<td>2D*4 Microgram to Milligram / liters to m3</td>
<td>0.0000001</td>
<td>0.0000001</td>
</tr>
<tr>
<td>Dose-inh</td>
<td>0.00001014</td>
<td>0.00003063</td>
</tr>
<tr>
<td>Construction Days</td>
<td>458</td>
<td>1.254794521</td>
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<td>potency factor for Diesel</td>
<td>1.1</td>
<td>1.1</td>
</tr>
<tr>
<td>Age Sensitivity Factor</td>
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<tr>
<td>ED</td>
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<td>1.254794521</td>
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<tr>
<td>AT</td>
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<td>70</td>
</tr>
<tr>
<td>FAH</td>
<td>0.85</td>
<td>2.7</td>
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<tr>
<td>Risk for Each Age Group</td>
<td>3.38731E-07</td>
<td>5.13342E-06</td>
</tr>
<tr>
<td>Risk per million Exposed</td>
<td>0.338730838</td>
<td>5.133418103</td>
</tr>
</tbody>
</table>

| Cancer Risk Per Million 9 years | 6.50 |
| Cancer Risk Per Million 30 years | 6.50 |
| Cancer Risk Per Million 70 years | 6.48 |