

July 20, 2011

County Clerk, Ms. Tasha Arterberry
County of Los Angeles
12400 E Imperial Hwy, Room 2001
Norwalk, CA 90650

Re: Notice of Determination – Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project Evaluated Pursuant to the Final Program Environmental Assessment for Proposed Amended Regulation XX – Regional Clean Air Incentives Market (RECLAIM), [SCH Number: 2009061088; SCAQMD Number: 06182009BAR]

Dear Ms. Arterberry:

Enclosed are two copies of a Notice of Determination (NOD) for the above project, which is located in Los Angeles County. A Final Program Environmental Assessment (PEA) was prepared in compliance with the California Environmental Quality Act (CEQA) and was certified on November 5, 2010 for Proposed Amended Regulation XX – Regional Clean Air Incentives Market (RECLAIM). Subsequent to the certification of the Final PEA, operators of Rhodia Inc. have applied for new Permit to Construct/Operate as part of their Wet Gas Scrubber/SOx RECLAIM Project. The Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project is an activity subsequent to certification of the Final PEA (CEQA Guidelines §15168 (c)(4)). The CEQA evaluation prepared for the proposed Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project, concluded that the project and its environmental impacts are within the scope of the Final PEA and no new environmental document is required (CEQA Guidelines §15168 (c)(2)).

The CEQA evaluation for the Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project was certified on July 19, 2011. Please record and post the NOD according to the provisions of CEQA. Enclosed is a check for \$75 to cover the handling fee for posting the NOD.

The NOD contained herein is for both a new Permit to Construct/Operate for which the SCAQMD has conducted a CEQA evaluation in accordance with the analysis in the Final PEA. The SCAQMD has determined that the project, which was evaluated when the Final PEA was prepared, will have no impact on wildlife and the habitat upon which it depends. Therefore, the project is exempt from the Department of Fish and Game filing fee pursuant to Section 753.5 (a)(3), Title 14, CCR. The CEQA Filing Fee No Effect Determination Form that has been signed and approved by the Department of Fish and Game is attached as proof of compliance and to ensure immediate posting of the NOD.

Please confirm receipt of one copy and return to the undersigned. Self-addressed envelopes have been provided for your convenience. If you have any questions, you can call me at (909) 396-3054 or Barbara Radlein at (909) 396-2716.

Sincerely,

Steve Smith, Ph.D.
CEQA Program Supervisor
Planning, Rule Development and Area Sources

NOTICE OF DETERMINATION

To: County Clerk, Tasha Arterberry
County of Los Angeles
12400 E Imperial Highway, Room 2001
Norwalk, CA 90650

From: South Coast Air Quality Management
District
21865 Copley Drive
Diamond Bar, CA 91765

SUBJECT: FILING OF NOTICE OF DETERMINATION IN COMPLIANCE WITH
§§21108 AND 21152 OF THE PUBLIC RESOURCES CODE AND §15094
OF THE CEQA GUIDELINES

Project Title: Rhodia Inc. Wet Gas Scrubber/SO_x RECLAIM Project

SCH Number: 2009061088

Contact Person: Barbara Radlein

SCAQMD Number: 06182009BAR

Telephone Number: (909) 396-2716

Date Certified: July 19, 2011

Email: bradlein@aqmd.gov

Project Location: The proposed project will occur at 20720 South Wilmington Avenue in the City of Carson, California.

Project Description: Rhodia Inc. (Rhodia) is a sulfuric acid manufacturer that was identified in the Final Program Environmental Assessment (PEA) for Proposed Amended Regulation XX – Regional Clean Air Incentives Market (RECLAIM) as a facility that may consider installing a wet gas scrubber to reduce oxides of sulfur (SO_x) emissions at its facility. To comply with the future SO_x emissions allocations that would occur in accordance with the November 2010 amendments to Regulation XX – RECLAIM, Rhodia is proposing to install a wet gas scrubber system to reduce sulfur dioxide (SO₂) emissions from its sulfuric acid gas plant. The proposed wet gas scrubber system will consist of a two-stage packed bed wet gas caustic scrubber, an acidulation tower and a caustic storage tank. Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring Plan were adopted in connection with the certification of the Final PEA. The currently proposed project would allow Rhodia to use groundwater in the wet gas scrubber instead of reclaimed water, which was not previously analyzed in the Final PEA.

This is to advise that the South Coast Air Quality Management District (SCAQMD) as the Lead Agency for the above described project has made the following determinations regarding the above described project:

1. The Rhodia Inc. Wet Gas Scrubber/SO_x RECLAIM Project is a subsequent activity of the project analyzed in the Final PEA, and has been analyzed in light of the Final PEA in accordance with CEQA Guidelines §15168 (c). The analysis concluded that pursuant to CEQA Guidelines §15162, the proposed project will not have any new effects or new mitigation measures, and is therefore within the scope of the project covered by the Final

PEA for Proposed Amended Regulation XX – Regional Clean Air Incentives Market (RECLAIM), which was certified on November 5, 2010.

2. A *CEQA Evaluation of the Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project* was prepared in accordance with CEQA Guidelines §15168 (c)(4), which concluded that impacts from the proposed project are within the scope of the Final PEA, and therefore, no additional CEQA document is necessary (CEQA Guidelines §15168 (c)(2)).
3. Mitigation measures were made a condition of approval of the Proposed Amended Regulation XX – Regional Clean Air Incentives Market (RECLAIM) and remain in effect, as applicable to Rhodia Inc. Because no new impacts were identified, no new mitigation measures specific to the Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project were made a condition of approval.
4. A mitigation monitoring plan was adopted for the Proposed Amended Regulation XX – Regional Clean Air Incentives Market (RECLAIM) and remains in effect, as applicable to Rhodia Inc. Because no new impacts were identified, a new mitigation monitoring plan specific to the Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project was not required and, therefore, not adopted.
5. A Statement of Overriding Considerations was adopted for Proposed Amended Regulation XX – Regional Clean Air Incentives Market (RECLAIM). Because no new impacts were identified, a Statement of Overriding Considerations was not required and, therefore, was not adopted for the Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project.
6. Findings for Proposed Amended Regulation XX – Regional Clean Air Incentives Market (RECLAIM) were made pursuant to the provisions of CEQA. Because no new impacts were identified, findings specific to the Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project were not required and, therefore, were not made pursuant to the provisions of CEQA.

This is to certify that the Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project, the *CEQA Evaluation of the Rhodia Inc. Wet Gas Scrubber/SOx RECLAIM Project*, supporting documentation, and record of project approval is available to the General Public at SCAQMD Headquarters located at 21865 Copley Drive, Diamond Bar, CA 91765.

Date Received for Filing

Signature: _____
Barry R. Wallerstein, D. Env.