Fw: SLO response to the Phillips 66 Oil Refinery request for oil trains

Ramona Hedges to: Ryan Hostetter 01/25/2016 09:10 AM

fyi below

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PLANNING & BUILDING
COUNTY OF SAN LUIS OBISPO

----- Forwarded by Ramona Hedges/Planning/COSLO on 01/25/2016 09:10 AM -----

From: "Bill Wagman" <wjwagman@dcn.org>
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Date: 01/22/2016 05:11 PM
Subject: SLO response to the Phillips 66 Oil Refinery request for oil trains

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Greetings,
I am attaching here my initial comment letter to you and your response. I appreciate that safety concerns have been carefully addressed, a very important issue. However I see nothing regarding the possibility of a train derailment. I train carrying sulfuric acid derailed in Martinez just two days ago (http://sanfrancisco.cbslocal.com/2016/01/20/train-cars-derail-under-i-680-in-martinez-hazmat-crews-respond/) . Fortunately nothing was spilled. Nevertheless, all the safety concerns addressed in your response to my comments do not seem to take into consideration the possibility of a derailment. What is the planned response should that occur?
Thank you.

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Wagman Bill.pdf

From: "Bill Wagman" <wjwagman@dcn.org>
To: <P66-railspur-comments@co.slo.ca.us>
Date: 11/20/2014 12:25 PM
Subject: Comment re Phillips 66 Railspur Project

Murry Wilson
SLO County Dept. of Planning and Building 976, Osos Street, Room 200 San Luis Obispo, 93408

Dear Mr. Murry Wilson,

Thank you for adding my comments to the public record on the Phillips 66 Railspur Project.

I am a resident of Davis, California, and the proposed 80-car crude-oil train headed to the Santa Maria refinery 5 days a week will travel through Davis. I am concerned for a number of reasons.

Two reasons (of several) are:

1. Cumulative impact. For Davis, the SLO rail spur adds the impact of two trains, not just one moving through our community daily. Both the 100 cars to Benicia and the 80 cars to SLO will return each day, as well. For Sac, it's the 5th train! This entire shift to crude-by-rail transport has to be taken into account. The decision of one Board of Supervisors can negatively impact uprail communities all the way to the borders of CA and to the source of the crude. We all live with the threat of more trains as Ca moves toward importing 25% of its crude by rail (CA Energy Commission projection). This critical decision reaches way beyond SLO County! WAB-01

2. "High Risk Rail" sections. Trains enter CA by one of three routes all of which include identified "high hazard" rail sections according to Office of Spill Prevention and Response Map. These include coming south through Dunsmuir (the site of a terrible spill that killed life in the Sacramento River for 35 miles for many years recently), through the Feather River Canyon with long stretches of rail on high wooden trestles, and over the treacherous Donner Pass and coming down into Colfax – all marked as high hazard rail stretches on the map. In addition, California has many untrustworthy old bridges not built to carry 100 heavy tank cars regularly or ever, such as the Carquinez Bridge at Benicia. The bridges are only now scheduled to receive minimal inspections for safety, but there is no money for repairs or replacement. WAB-02

Thank you.

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Responses to Bill Wagman Comments

WAB-01	Section 4.7.6 (see Section 4.7, Hazards and Hazardous Materials) discusses the risk levels associated the cumulative crude by rail project along various stretches of mainline track including the portions. Table 3.1 (see Chapter 3.0, Cumulative Project Description) provides a list of the cumulative crude by rail projects. The cumulative analysis examines the proposed crude by rail traffic moving along the various mainline tracks. Between Benicia and Sacramento there could be up to 1,345 trains per year. From Sacramento to either Nevada or Oregon there could be up to 2,805 trains per year. The peak day one-way trips would range from eight to 16 depending upon the location. The impacts of this cumulative crude by rail traffic have been discussed in the cumulative impact section of each of the issue areas (see Chapter 4.0, Environmental Analysis).
WAB-02	A Quantitative Risk Analysis (QRA) was conducted as part of the RDEIR and is documented in the Hazards and Hazardous Materials Section (see Section 4.7 and Appendix H). The rail routes were divided up into distinct segments to account for differing population levels along the rail routes. Each segment was assigned a population density reflecting the unique populations along the rail route. Segments where facilities and/or events might attract temporary high population levels were assigned a population that reflected the larger temporary population, and did not correct for seasonal or diurnal variation, thus slightly overestimating the risk for the segment. The fact that every possible landmark along the proposed rail routes is not explicitly mentioned does not mean that it was omitted. The population assigned for each segment characterizes the potential residential, commercial, industrial, and venue population that is, or could be temporarily, present along the segment. In July 2010, Federal Railroad Administration (FRA) released a Bridge Safety Standards Final Rule requiring railroad track owners to adopt and follow specific procedures to protect the safety of their bridges and to strengthen federal oversight of railroad bridge programs. The Bridge Safety Standards Final Rule requires rail carriers to: • Implement bridge management programs that include at minimum annual inspections of railroad bridges • Conduct special inspections if the weather or other conditions warrant such inspections • Maintain an inventory of all railroad bridges and know their safe load capacities • Maintain design documents and to document all repairs, modifications, and inspections of each bridge • Ensure bridge engineers, inspectors and supervisors must meet minimum qualifications • Make sure bridge inspections are conducted under the direct supervision of a designated railroad bridge inspector

	• Conduct internal audits of bridge management programs and inspections 49 CFR 237.71 requires railroad bridge owners to determine bridge load capacities as follows: (a) Each track owner shall determine the load capacity of each of its railroad bridges. The load capacity need not be the ultimate or maximum load capacity, but must be a safe load capacity. (b) The load capacity of each bridge shall be documented in the track owner's bridge management program, together with the method by which the capacity was determined. (c) The determination of load capacity shall be made by a railroad bridge engineer using appropriate engineering methods and standards that are particularly applicable to railroad bridges. (d) Bridge load capacity may be determined from existing design and modification records of a bridge, provided that the bridge substantially conforms to its recorded configuration. Otherwise, the load capacity of a bridge shall be determined by measurement and calculation of the properties of its individual components, or other methods as determined by a railroad bridge engineer. (e) If a track owner has a group of bridges for which the load capacity has not already been determined, the owner shall schedule the evaluation of those bridges according to their relative priority, as established by a railroad bridge engineer. The initial determination of load capacity shall be completed no later than five years following the required date for adoption of the track owner's bridge management program in conformance with § 237.31. (f) Where a bridge inspection reveals that, in the determination of the railroad bridge engineer, the condition of a bridge or a bridge component might adversely affect the ability of the bridge to carry the traffic being operated, a new capacity shall be determined. (g) Bridge load capacity may be expressed in terms of numerical values related to a standard system of bridge loads, but shall in any case be stated in terms of weight and length of individual or combined cars and locomotives, for the use of transportation personnel. (h) Bridge load capacity may be expressed in terms of both normal and maximum load conditions. Operation of equipment that produces forces greater than the normal capacity shall be subject to any restrictions or conditions that may be prescribed by a railroad bridge engineer. The bridges along the proposed routes are currently rated to accommodate crude oil unit trains. ExxonMobil currently operates a unit train from San Ardo to Los Angeles following the same route as proposed by Phillips 66, including the Cuesta Grade and Stenner Creek Bridge. Plains All American pipeline also

	receives crude oil unit trains at their Kern County terminal that traverse much of the same routes that the proposed Phillips 66 unit trains would utilize.