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Cc: Yu-Shuo Chang <[YChang@placer.ca.gov](mailto:YChang@placer.ca.gov)>  
Date: 11/24/2014 02:31 PM  
Subject: Phillips 66 Company Rail Spur Extension Project

Mr. Wilson,

Thank you for forwarding the RDEIR for the Phillips 66 Project to our office for review. Our comments are attached for consideration.

If there are any questions, feel free to contact me directly.

Best regards,

Angel Green  
Associate Planner  
Placer County Air Pollution Control District  
110 Maple Street, Auburn Ca 95603 Auburn, CA 95603  
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If you are planning for a year, sow rice;  
if you are planning for a decade, plant trees;  
if you are planning for a lifetime, educate people.  
(See attached file: SLO County Phillips 66 SMR Rail Project RDEIR PCAPCD  
comment.pdf)



November 24, 2014

Murry Wilson  
Department of Planning and Building  
San Luis Obispo County  
976 Osos Street, Room 200  
San Luis Obispo, CA 93408-2040  
SENT VIA: [p66-railspur-comments@co.slo.ca.us](mailto:p66-railspur-comments@co.slo.ca.us)

**SUBJECT: Phillips 66 Company Rail Spur Extension Project  
Recirculated Draft Environmental Impact Report (RDEIR)**

Dear Mr. Wilson,

The Placer County Air Pollution Control District (PCAPCD) has reviewed the RDEIR and associated air quality analyses prepared for the Phillips 66 (Applicant) Company Rail Spur Extension Project (Project). The Applicant proposes to modify the existing rail spur currently at the Santa Maria Refinery (SMR) located in unincorporated San Luis Obispo, in order to receive up to 52,000 barrels of crude oil per unit train, with an anticipated delivery schedule consisting of five trains per week<sup>1</sup>. The crude oil would be shipped by tank cars operated by the Union Pacific Railroad (UPRR), from oilfields throughout North America to the Roseville Railyard in Placer County<sup>2</sup>, to be assembled into a train for shipment to the SMR. The PCAPCD provides the following comments relating to the Project's air quality impacts.

Incomplete Analysis for Project-related Operational Emissions Occurring in Placer County

The Mainline Rail Emissions occurring within Placer County, as shown in Tables 4.3.18, appear to be underestimated. The Locomotive Emissions report<sup>3</sup> does not contain emission calculations for the Roseville Railyard activity (i.e., switching, idling, maintenance and service, movement and testing). Idling alone can represent about 45 percent of emissions resulting from locomotive activities<sup>4</sup>. **PCAPCD recommends the analysis and impact discussion for Impact AQ.3 should include both emission calculations for criteria pollutant and greenhouse gases associated with these activities, including emissions associated with the use of steam to heat the rail cars in the event of delays or low temperatures<sup>5</sup> which may occur at the Roseville Railyard.**

PCAPCD-01

Mitigation Monitoring, Compliance, and Reporting Program

As stated in the RDEIR, the purpose of a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) is to ensure that measures adopted to mitigate or avoid significant impacts are implemented<sup>6</sup>. In order to reduce criteria pollutant emissions from the mainline rail below each applicable Air District, the RDEIR incorporates Mitigation Measure AQ-3 as follows:

PCAPCD-02

1 RDEIR, 2.5 Project Description, page 2-22

2 RDEIR, 4.3 Air Quality and Greenhouse Gases, page 4.3-51

3 RDEIR, Appendix B Air Emission Calculations, page B-9

4 Air Resources Board Roseville Rail Yard Study (October 14, 2004), page 1 & 14:

<http://www.placer.ca.gov/~media/apc/documents/UP/2004/UPRailYardStudyFinal101404.ashx>

5 RDEIR, 2.0 Project Description, page 2-14

6 RDEIR, 8.0 Mitigation Monitoring Plan, page 8-1

*Prior to issuance of the Notice to Proceed, the Applicant shall investigate methods for reducing the locomotive emissions through contracting arrangements that require the use of Tier 4 locomotives or equivalent emission levels. If the mainline rail emissions of ROG+NOx and DPM with the above mitigations still exceed the applicable Air District thresholds, the Applicant shall secure emission reductions in ROG + NOx and DPM emissions within each applicable Air District, similar to the emission reduction program utilized by the SLOCAPCD, to ensure that the main line rail ROG + NOx and DPM emissions do not exceed the Air District thresholds for the life of the project. The Applicant shall provide documentation from each Air District to the San Luis Obispo County Planning and Building Department that emissions reductions have been secured for the life of the project prior to issuance of the Notice to Proceed<sup>7</sup>.*

The compliance verification method for AQ-3 provided in the MMCRP states that the Applicant is to provide a letter from other Air Districts covering emission reduction credits. Given that the availability of Tier 4 locomotives, and the ability of the Applicant to ensure their use, are somewhat speculative and likely to be preempted by Federal law<sup>8</sup>, additional on/off-site mitigation measures should be implemented to reduce the Project's related impacts. Because the RDEIR concludes for Impact 4.3, that health impacts would be reduced to a level of less-than-significant<sup>9</sup> within most air districts, mitigation measures must be real and quantifiable and shall not be deferred or contingent upon other measures failing. Until such agreements have been reached, AQ-3 is speculative in that these agreements have not been established. **Prior to certifying the Final EIR, the PCAPCD recommends the Lead Agency investigate the likelihood of harvesting emission reductions and the associated cost effectiveness for the purchasing of offsite credits, and arrange for agreements with each impacted air district. The RDEIR should also include within its MMCRP a summary of the emissions and required reductions necessary within each air district (excluding emission reductions from mitigation which may be preempted by Federal law), as well as the cost effective amount per ton required by each air district.**

PCAPCD-02  
cont

#### Significance Findings for Health Impacts

In addition to Placer, Sacramento, Solano, and Yolo Counties, there are many other counties within Northern California (including portions of Sacramento Valley and Mountain Counties Air Basins) designated as nonattainment for the federal and state ozone standards<sup>10,11</sup>. Since the RDEIR has identified in Table 4.3.19, the project-related operational emissions occurring within each of the applicable air districts along the UPRR routes in Northern California, it is not clear why the RDEIR does not make a determination of potential health impacts occurring in each of the identified air districts, or why these emissions were not considered in the significance determinations in Table 4.3.21. **The PCAPCD recommends the RDEIR analyze the potential health impacts associated with the emissions from the Mainline Rail past the Roseville Rail Yard for the other areas in Northern California.**

PCAPCD-03

The RDEIR concludes in Table 4.3.21 that the Project would not generate criteria pollutant emissions in excess of PCAPCD thresholds, and therefore the Project would not result in significant health impacts. However, Table 4.3.19 of the RDEIR indicates that the mainline rail emissions past the Roseville Railyard would result in more than 500 lbs/day of NOx in Placer County, well above the PCAPCD thresholds. Additionally, the data provided in the "Summary of Mitigated Operational Mainline Rail

PCAPCD-04

7 RDEIR, 4.3 Air Quality and Greenhouse Gases, page 4.3-55

8 RDEIR, 4.3 Air Quality and Greenhouse Gases, page 4.3-56

9 RDEIR, 4.3 Air Quality and Greenhouse Gases, Table 4.3.21

10 Area designation map for federal ozone standards [http://www.arb.ca.gov/degis/adm/2013/fed\\_o3.pdf](http://www.arb.ca.gov/degis/adm/2013/fed_o3.pdf)

11 Area designation map for state ozone standards [http://www.arb.ca.gov/degis/adm/2013/state\\_o3.pdf](http://www.arb.ca.gov/degis/adm/2013/state_o3.pdf)

Emissions” includes criteria pollutant emissions between the Roseville Railyard to the southern Placer County boundary, consisting of 1.8 miles, and does not account for the miles traveled past the Roseville Railyard toward northern California<sup>12</sup>. **PCAPCD recommends the RDEIR include a table summarizing the Project’s total unmitigated/mitigated emissions, including all Mainline Rail Emissions occurring in each air basin from the California boundary to the SMR, as well as the Roseville Railyard emissions. Last, it is the District’s opinion that the RDEIR should base its environmental determination on the total Project-related emissions, and mitigate those emissions to a level of less-than-significant, if feasible.**

PCAPCD-04  
cont

#### Health Risk Impacts

The RDEIR fails to identify the potential health risk impacts to sensitive receptors living within close proximity to the Roseville Railyard and along the mainline rail from Roseville to the California border. The crude oil to be received by the SMR would travel from the California and Oregon borders to the Roseville Railyard for transfer and service of tank cars and associated locomotives<sup>13</sup>, resulting in increased Diesel Particulate Matter emissions from yard activities (i.e., switching, idling, maintenance and service, movement and testing). Previous studies indicate that risk impacts associated with DPM emissions resulting from the yard activities have potential cancer risks to sensitive receptors within close proximity to the Roseville Railyard<sup>14</sup>.

PCAPCD-05

**The PCACPD requests the Lead Agency prepare a Health Risk Assessment (HRA) to determine the potential health impacts on the Roseville residents from increased operations associated with the additional activity at the Railyard necessary to carry out the approval of the Project. PCAPCD requests that all assumptions, factors and other data used in the HRA be made available to the public.**

The PCAPCD appreciates the opportunity to comment on the RDEIR prepared for the Phillips 66 Project. **We kindly request written notification prior to the certification of the Final EIR. The District would be happy to work with the Lead Agency to address these issues and any other questions that may arise.**

If there are any questions regarding the comments made within, please do not hesitate to contact me at 530.745.2333 or [agreen@placer.ca.gov](mailto:agreen@placer.ca.gov).

Respectfully,



Angel Green,  
Associate Planner  
PCAPCD Planning & Monitoring Section

ec: Yu-Shuo Chang, Air Quality Planning and Monitoring Manager, PCAPCD

<sup>12</sup> RDEIR, Appendix B Air Emission Calculations, page B-14

<sup>13</sup> RDEIR, 2.0 Project Description, page 2-1

<sup>14</sup> Air Resources Board Roseville Rail Yard Study (October 14, 2004), page 1 & 14:

<http://www.placer.ca.gov/~media/apc/documents/UP/2004/UPRailYardStudyFinal101404.ashx>