

From: "S. Saltoun" <ssyw1@verizon.net>
To: <p66-railspur-comments@co.slo.ca.us>
Cc: "Paul Stolpman" <stolpman@hotmail.com>, "Supervisor Caren Ray" <cray@co.slo.ca.us>
Date: 01/03/2014 10:21 AM
Subject: DEIR Comment - Santa Maria Refinery Rail Project

Dear Mr. Wilson,

The attached U.S. DOT Safety Alert dated January 2, 2014 addresses flammability of crude oil transported by rail from the Bakken region. During the December 12, 2013 EIR Workshop, it was noted that Bakken crude may be included in the proposed rail shipments to the Phillips 66 Santa Maria Refinery.

Questions for DEIR:

1. Recognizing the close proximity of the proposed rail project to residential areas, how will the significant safety issues regarding the more flammable Bakken heavy crude oil be mitigated? SS-1
2. In the event of a possible accidental oil spill or fire, what contingency plans will be in place for evacuation and closure of residential and commercial areas, and what provisions will be made for environmental restoration, property rehabilitation, and public and individual compensation? SS-2

Sincerely,

Sam Saltoun

Samuel Saltoun

1918 Eucalyptus Road

Nipomo, CA 93444

ssyw1@verizon.net

(805) 363-1002 (See attached file: 1_2_14%20Rail_Safety_Alert.pdf)



The Pipeline and Hazardous Materials Safety Administration

1200 New Jersey Avenue, SE
Washington, DC 20590
www.phmsa.dot.gov

Safety Alert -- January 2, 2014

Preliminary Guidance from OPERATION CLASSIFICATION

The [Pipeline and Hazardous Materials Safety Administration](http://www.phmsa.dot.gov) (PHMSA) is issuing this safety alert to notify the general public, emergency responders and shippers and carriers that recent derailments and resulting fires indicate that the type of crude oil being transported from the Bakken region may be more flammable than traditional heavy crude oil.

Based upon preliminary inspections conducted after recent rail derailments in North Dakota, Alabama and Lac-Megantic, Quebec involving Bakken crude oil, PHMSA is reinforcing the requirement to properly test, characterize, classify, and where appropriate sufficiently degasify hazardous materials prior to and during transportation. This advisory is a follow-up to the PHMSA and Federal Railroad Administration (FRA) [joint safety advisory](#) published November 20, 2013 [78 FR 69745]. As stated in the November Safety Advisory, it is imperative that offerors properly classify and describe hazardous materials being offered for transportation. 49 CFR 173.22. As part of this process, offerors must ensure that all potential hazards of the materials are properly characterized.

Proper characterization will identify properties that could affect the integrity of the packaging or present additional hazards, such as corrosivity, sulfur content, and dissolved gas content. These characteristics may also affect classification. PHMSA stresses to offerors the importance of appropriate classification and packing group (PG) assignment of crude oil shipments, whether the shipment is in a cargo tank, rail tank car or other mode of transportation. Emergency responders should remember that light sweet crude oil, such as that coming from the Bakken region, is typically assigned a packing group I or II. The PGs mean that the material's flashpoint is below 73 degrees Fahrenheit and, for packing group I materials, the boiling point is below 95 degrees Fahrenheit. This means the materials pose significant fire risk if released from the package in an accident.

As part of ongoing investigative efforts, PHMSA and FRA initiated "Operation Classification," a compliance initiative involving unannounced inspections and testing of crude oil samples to verify that offerors of the materials have been properly classified and describe the hazardous materials. Preliminary testing has focused on the classification and packing group assignments that have been selected and certified by offerors of crude oil. These tests measure some of the inherent chemical properties of the crude oil collected. Nonetheless, the agencies have found it necessary to expand the scope of their testing to measure other factors that would affect the proper characterization and classification of the materials. PHMSA expects to have final test

results in the near future for the gas content, corrosivity, toxicity, flammability and certain other characteristics of the Bakken crude oil, which should more clearly inform the proper characterization of the material.

“Operation Classification” will be an ongoing effort, and PHMSA will continue to collect samples and measure the characteristics of Bakken crude as well as oil from other locations. Based on initial field observations, PHMSA expanded the scope of lab testing to include other factors that affect proper characterization and classification such as Reid Vapor Pressure, corrosivity, hydrogen sulfide content and composition/concentration of the entrained gases in the material. The results of this expanded testing will further inform shippers and carriers about how to ensure that the materials are known and are properly described, classified, and characterized when being shipped. In addition, understanding any unique hazards of the materials will enable offerors, carriers, first responders, as well as PHMSA and FRA to identify any appropriate mitigating measures that need to be taken to ensure the continued safe transportation of these materials.

PHMSA will share the results of these additional tests with interested parties as they become available. PHMSA also reminds offerors that the hazardous materials regulations require offerors of hazardous materials to properly classify and describe the hazardous materials being offered for transportation. 49 CFR 173.22. Accordingly, offerors should not delay completing their own tests while PHMSA collects additional information.

For additional information regarding this safety alert, please contact Rick Raksnis, PHMSA Field Services Division, (202) 366-4455 or E-mail: Richard.Raksnis@dot.gov. For general information and assistance regarding the safe transport of hazardous materials, contact PHMSA’s Information Center at 1-800-467-4922 or phmsa.hm-infocenter@dot.gov.



COMMENTS ON THE PHILLIPS 66 RAIL SPUR EXTENSION PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

The following are useful types of comments in addressing the following issues:

- Content of the EIR.
- Methods on how environmental issues are analyzed.
- Potential Alternatives to the project.
- Potential mitigation measures that would avoid or reduce environmental issues.

Regarding the release of noxious fumes (including both those that have adverse health effects, and those that simply are detectable off the project site.)

1. What events during offloading + pumping risk release?
2. What mitigating measures are planned?
3. How will releases be detected and documented?
4. What is the planned response to a release?

NAME: Sam Saltoun
ADDRESS: 1918 Eucalyptus Rd
CITY: Nipomo, CA

EMAIL: ssyw1@verizon.net
PHONE: (805) 363-1002
STATE: CA ZIP: 93944

SS-3

From: "S. Saltoun" <ssyw1@verizon.net>
To: <p66-railspur-comments@co.slo.ca.us>
Cc: "Supervisor Caren Ray" <cray@co.slo.ca.us>
Date: 01/23/2014 12:29 PM
Subject: DEIR Comment - Santa Maria Refinery Rail Project

Dear Mr. Wilson,

This is a question for the Santa Maria Rail Project draft EIR:

1. In regard to impact numbers BIO.7b and WR2b on potential adverse events on the UPRR mainline track, have comments been solicited from Monterey County, Santa Barbara County, and other effected county's cognizant staffs regarding these Class I impacts that could project into their jurisdictions?
2. If other counties have been invited to comment, when will their comments, if any, be available for public review? If they have not been invited to comment, does San Luis Obispo County have an duty to inform them that this project includes Class I impacts that pertain to them?

SS-4

Sincerely,

Sam Saltoun

Samuel Saltoun
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Nipomo, CA 93444
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