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SLO COUNTY apcd
Air Pollution Control District
San Luis Obispo County

January 27, 2014

Murry Wilson
SLO County Planning Department
County Government Center, Room 310
San Luis Obispo CA 93401

SUBJECT: APCD Comments Regarding the DRC2012-00095 PHILLIPS 66 CO - railroad spur Environmental Impact Report

Dear Mr. Wilson,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the above referenced project located at 2555 Willow Road in Arroyo Grande.

The proposed project is comprised of two distinct components: the proposed Rail Spur Extension and a separate and distinct possible provision for various Coastal Access options through the site. The two project components are summarized below:

Rail Spur Extension: The proposed rail extension includes a request by Phillips 66 Company for a Development Plan/ Coastal Development Permit to allow for the extension of an existing rail spur at the Santa Maria Refinery and construction of a railcar off-loading facility, above ground pipeline, restroom facility, and an unpaved emergency vehicle access road from the end of the proposed rail spur to State Route 1.

Coastal Access: The project also includes a conceptual plan for provision of vertical Coastal Access through the project site located to the west of the Oceano Dunes State Vehicular Park Recreation Area. As part of a separate permit issued for the project site, initiated by Phillips 66 in 2008 and approved by the County Board of Supervisors in February 2013, Phillips 66 may be required to construct vertical public access from State Route 1 to their western property line to comply with the coastal access provisions of the County's Coastal Zone Land Use Ordinance. Although the provision of coastal access is not integral to, and has independent utility from, the Rail Spur Extension project, it is appropriate to include and analysis of the potential environmental impacts of the access way because of the shared environmental setting and regulatory framework of the two adjoining components.

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and

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operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text**.

GENERAL COMMENTS

1. **Baseline**

The baseline used for Rail Spur EIR is the permitted levels at which the refinery is currently operating. As noted in the EIR, it does not include the refinery's through-put increase of 10% which was approved by the San Luis Obispo County in March 2013. While the refinery throughput increase has not received final permitting approval from the SLOCAPCD that process is underway and once final permits are issued the refinery will be able to increase the amount of crude it processes. While determining baseline for this project is a somewhat gray area, given the interim status of refinery operations, it should be noted the data presented in some of the table (ie 4.3.6) is lower than what actually will be allowed once final permits are issued. Therefore, this EIR under represents what the actual emissions from this facility will be once the throughput increase commences. APCD-1

2. Cumulative Impacts

SLOCAPCD staff believes the cumulative analysis on page 4.3-52 fell short of addressing the cumulative impacts of this project and the 10% refinery crude throughput increase recently approved by the County. By analyzing these two projects in separate EIRs, the cumulative impacts for some of the processes and activities may be underestimated. For example, this DEIR concluded that the greenhouse gases from the rail spur project would be less than significant and would not require mitigation. First, for reason sited below, the SLOCAPCD does not agree with that conclusion, furthermore, if the cumulative impacts from both projects are evaluated together there is no doubt that the GHGs from both projects would exceed the SLOCAPCD GHG threshold of 10,000 metric ton CO2e. APCD-2

Another important area where cumulative impacts appear to be overlooked is air toxics. The air toxic discussion (Page 4.3-47 and 4.3-48) appears to focus only on the air toxics associated with the rail spur project and does not address or consider the existing risk associated with the refinery and/or the refinery throughput increase. SLOCAPCD staff suggests the total risk be address in the cumulative evaluation so that overall toxic risk from the entire facility is accurately depicted.

3. **Process Equipment**

In May 2013, SLOCAPCD staff reviewed the initial study and associated project description for the Phillips 66 rail spur project. A comment letter dated May 28, 2013 was submitted to County Planning outlining the issues and questions the APCD had regarding the project and the emission calculations presented with that document. A copy of that letter is attached for reference. In that letter there were numerous emissions sources that do not appear to be factored into the overall air quality impacts address in this DEIR. Some examples being: 1) the construction of a new boiler in the utility plant to provide heat to off load heavy crudes from the unloading facility; 2) installation of aluminum dome roofs on two of the refinery tanks; 3) main line turnout modification and fugitive emissions associated with heating the crude prior (when required) offloading. To accurately characterize the air quality impacts, both the construction and operational phase emissions from these sources must be evaluated. APCD-3

If the refinery plans on processing heavy crudes in the future and the refinery process would need to be modified to handle heavier crudes, these emission sources should be addressed as part of this project so the total impacts from the facility are accurately represented and evaluated. APCD-3

GENERAL COMMENTS

Page 4.3-19 and 20, Current emission from the refinery operations
As indicated above, the data presented in tables does not include the refinery crude throughput increase approved by the County in 2013. APCD-4

Page 4.3-37, Mitigation Measure AQ-1c
It appears a mitigation number has been omitted on page 4.3-37. The numbering goes from AQ-1a to AQ-1c. This could be confusing during implementation of the measures. Please check and correct as appropriate. APCD-5

Page 4.3-40, Residual Impacts for Construction Emissions
The text at the bottom of page 4.3-40 under the residual impact discussion states,

> *"Implementation of construction equipment controls for diesel particulate matter would reduce DPM to level below the threshold (see Table 4.3.12)."*

APCD-6

This is not correct. While the data shows that the DPM levels would be less than the daily DPM threshold, the project's quarterly emissions of 0.15 tons/quarter slightly exceeds the SLOCAPCD Tier 1 threshold of 0.13 tons/quarter. **Additional mitigation should be included to reduce the DPM to a level below the threshold.**

Also as shown in Table 4.3.12, the construction emissions for ROG+ NOx after mitigation will still exceed the CEQA Tier I threshold of 2.5 tons/qtr. **APCD staff recommends the following to further reduce construction emissions on-site:**

- Include the use of Tier 4 off-road and 2010 on-road compliant engines;
- Repowering equipment with the cleanest engines available; and
- Installing California Verified Diesel Emission Control Strategies. These strategies are listed at: http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm

APCD-7

If these measures are not sufficient to reduce emissions to a level below the CEQA threshold, as discussed in the EIR, off site mitigation will be required.

Page 4.3-43, AQ-2a Mitigation Measure for ROG+NOx,
Mitigation Measure AQ-2a states:

> *".... The Applicant shall secure SLOAPCD –approved off-site reduction in ROG + NOx emissions to ensure that project-related ROG+NOx emission within SLO County do not exceed the SLOCAPCD threshold for the life of the project...."*

APCD-8

Therefore, it is the SLOCAPCD's position that emissions above the APCD threshold should be mitigated for the entire project, not just within San Luis Obispo County. **SLOCAPCD recommends this mitigation measure be modified to reflect this change.** APCD-8

Page 4.3-43, AQ-2b Mitigation Measure for ROG+NOx
AQ-2b requires a program be implemented to include training and procedures to limit locomotive on-site idling to no more than 15 consecutive minutes, except when idling is required for safety purposes. This program should include provisions for enforcement of the policy and procedures. Policy and procedures will only be effective if they are enforced. There must be some mechanism to ensure measures are implemented. **SLOCAPCD staff recommends this mitigation measure be modified to include an enforcement mechanism.** APCD-9

Page 4.3-48, AQ-3 Mitigation Measure for Diesel Particulate Matter (DMP)
AQ-3 states the following:

> *"Prior to issuance of the Notice to Proceed, the Applicant shall investigate methods for reducing the locomotive emissions through the contracting arrangement that increase the use of Tier 1 and better locomotives. If emissions of diesel particulate with the above mitigations still exceed the thresholds, the Applicant shall secure SLOCAPCD-approved off-site reductions in particulate matter emissions to ensure that project-related diesel particulate emissions within SLO County do not exceed the SLOCAPCD thresholds for the life of the project. Coordination with the SLOCAPCD should begin at least six (6) months prior to issuance of operational permits for the Project to allow time for refining calculations and for the SLOCAPCD to review and approve the off-site mitigation approach."*

APCD-10

Due to the toxic nature of DPM, and the high health risk values associated with this project, SLOCAPCD recommends DPM emissions be mitigated on-site, and that off-site mitigation not be an option for DPM. SLOCAPCD staff recommends the mitigation measure be updated to reflect this change.

Page 4.3-48, Air Toxics
The following message was listed at the end of the AERMOD run – **please explain its significance and how it might impact the health risk data presented. More detail should also be provided on the assumption and method used to determine the risk.**

> *"CAUTION!: Number of Missing Hours Exceeds 10 Percent of Total!*
> *Data May Not Be Acceptable for Regulatory Applications.*
> *See Section 5.3.2 of "Meteorological Monitoring Guidance*
> *for Regulatory Modeling Applications" (EPA-454/R-99-005)."*

APCD-11

As indicated on page 4.4-48, meteorological data for surface air conditions came from the Santa Maria station. It should be noted that there are several meteorological stations closer to the source that could be used.

In addition, **as indicated above, the SLOCAPCD recommends the air toxic section include a discussion of the new risk associated with the rail spur project, the existing risk associated with the existing facility and the combined overall risk**. APCD-11

Page 4.3-50, Greenhouse Gases
As indicated above, the discussion of impacts and required mitigation for GHG should not be limited to San Luis Obispo County but include the entire project. Both CEQA and AB32 (California Global Warming Solutions Act) apply to the entire State of California and GHGs are a global pollutant. SLOCAPCD staff do not agree with this approach or the less than significant finding indicated on page 4.3-51.

SLOCAPCD staff recommends a mitigation measure be added to address GHGs.
Possible language could include:

> *"The Applicant shall investigate onsite methods for reducing GHG emissions to bring the project below the SLOAPCD GHG threshold (10,000 metric tonnes per year), for the entire project and for the life of the project. If after all onsite mitigations are implemented, the GHG emissions still exceed the threshold then off-site mitigation will be required. Coordination with the SLOAPCD should begin at least six (6) months prior to issuance of operational permits for the Project to allow time for refining calculations and for the SLOAPCD to review and approve the off-site mitigation approach."* APCD-12

Page 4.3-52, Mitigation Measure AQ-6, Odors
Mitigation Measures AQ-6, as written, is confusing and does not seem stringent enough to ensure odors will not be an issue. In light of previous odor related problems at the refinery and the low odor threshold for H2S, SLOCAPCD staff agrees that Odor Control Plan updates related to this project are needed and should include routine monitoring. However, the frequency and levels (100-500 ppm would be a high number for H2S and most likely is referring to hydrocarbons, but that is not clear) proposed in the measure do not seem adequate. **The Plan Update may consider a tier approach where the monitoring frequency initially is daily or even several times a day and at a level to ensure odors are not going to be an issue. After sufficient data is collected, under varied operating conditions, a decreased monitoring frequency could be proposed if odors are not an issue.** APCD-13

In addition to monitoring, the Odor Control Plan should also detail control measures and/or operating procedures that will be implemented to reduce odor impacts. Once again, a tiered approach may be included with additional measures proposed that could be implemented if the need arises. The Plan Update should also include an implementation schedule for incorporating additional measures if needed.

Page 9.25, Chapter 9 Coastal Access
Under the Environmental Setting for the Coastal Access Assessment the following statement is made:

"California Department of Parks and Recreation (CDPR) proposes to install, operate, and maintain meteorological, sand flux (i.e., sand movement), and particulate matter monitoring equipment and dust and track-out control measures primarily in and within the vicinity of Pismo State Beach and ODSVRA in San Luis Obispo (SLO) County. The proposed equipment and control measures are intended to provide information on the dynamics of dust generation at Pismo State Beach and ODSVRA, to help limit high levels of suspended particulate matter (PM) with an aerodynamic diameter of 10 micrometers or less (PM10) on the Nipomo Mesa, in SLO County, and also to comply with SLO County Air Pollution Control District Rule 1001"

APCD-14

SLOCAPCD staff does not agree with the phrase that the "*...provide information on the dynamics of dust generation at the Pismo State Beach and ODSVRA*", and recommend this phrase be deleted from the text.

Page 9-26, Coastal Access, Bike and Pedestrian Option
In addition to Mitigation Measure AQ-1 proposed for the Bike and Pedestrian option, SLOCAPCD recommends including the following measures:

Naturally Occurring Asbestos
The project site is located in a candidate area for Naturally Occurring Asbestos (NOA), which has been identified as a toxic air contaminant by the California Air Resources Board (ARB). Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, prior to any grading activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if NOA is present within the area that will be disturbed**. If NOA is not present, an exemption request must be filed with the District (see Attachment 1**). If NOA is found at the site the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. Please refer to the APCD web page at http://www.slocleanair.org/business/asbestos.asp for more information or contact the Enforcement Division at 781-5912.

APCD-15

Demolition
Demolition and remodeling activities have potential negative air quality impacts, including issues surrounding proper demolition and disposal of asbestos containing material (ACM). Demolition and remodeling projects are subject to the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (NESHAP), which includes but is not limited to: 1) notification requirements to the APCD, 2) asbestos survey conducted by a Certified Asbestos Inspector, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at 781-5912 prior to final approval of these types of projects by your agency.

Page 9-26 Coastal Access, Bike and Pedestrian Option
SLOCAPCD staff does not agree with the conclusion there would be no new operational air emissions from development of this project. While a certain percent of the visitors to this location may be a result of visitor shifting from another ODSVRA entrance, there most likely will be some new

APCD-16

vehicle trips to this location. **SLOCAPCD staff recommend, as a worst case scenario, that all the vehicle related emissions be modeled.** APCD-16

Page 9-27 Coastal Access, Motor Vehicles, Bike and Pedestrian Option
Same comment as above for new trip vehicle emissions.

It should also be noted that a motor vehicle access at the refinery would increase localized particulate matter located in close proximity to the Cal Fire air quality monitoring station. This monitoring station records the highest level of PM concentration currently in SLO County and would likely increase with the motor vehicle access. APCD-17

Appendix B
Page B-6
SLOCAPCD staff were unable to verify all of the calculations in the table on page B-6. In order for us to complete our review of the locomotive calculations we will need either sample calculations showing the formulas used in the spreadsheet or a copy of the excel spreadsheet. APCD-18

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-4667.

Sincerely,

Melissa Guise

Melissa Guise
Air Quality Specialist

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Attachments: SLOCAPCD Letter dated May 28, 2013

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SLO COUNTY apcd | Air Pollution Control District
San Luis Obispo County

May 28, 2013

Mr. Murry Wilson, Environmental Specialist
County of San Luis Obispo
Planning & Building Dept., Environmental Division
County Gov't Center #310
San Luis Obispo CA 93401

SUBJECT: APCD Comments Regarding the DRC2012-00095 PHILLIPS 66 , Santa Maria Refinery (SMR) Railroad Spur Initial Study / Mitigated Negative Declaration.

Dear Mr. Wilson,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the above referenced project located at 2555 Willow Road in Arroyo Grande. The project as proposed will modify the existing rail spur at the refinery to allow for the delivery of crude oil to the SMR for processing.

The following are APCD comments that are pertinent to this project.

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each.

Based on the APCD preliminary review of land use application package it would appear the calculations and conclusions presented in the initial study and project description do not fully categorize all the emissions that will be associated with the project. A number of the emissions sources seem to have been omitted from the project emission calculations. These sources need to be addressed so that the full impacts of the project can be thoroughly assessed.

From the limited information provided in Appendix A (page 12) it also appears that only the emissions from rail hauling in the state of California were included in the calculations. All emissions associated with the project should be quantified whether they occur inside or outside the state of California. In addition, all assumptions, emission factors and supporting calculations (i.e. spreadsheets and CalEEMod reports) should be provided to APCD to enable staff to review and verify the calculations.

PROJECT SPECIFIC COMMENTS ON INITIAL STUDY

Page 5 – Mainline Turnout – The project description indicates that a modification or replacement of the mainline turnout many be required as part of this project. This work should be included in the construction calculations as a worst case scenario. It is not clear, from the data presented in Appendix A, if the turnout has been included in the construction calculations.

Page 6 – The project description indicates that carbon beds will be used in series to handle air/vapor from the unloading process. A description on how the filter medium will be regenerated and how the emissions from the regeneration process will be handled should be provided in the initial study. These emissions should also be included in the operational phase emission calculations.

Page 6 – It does not appear that the construction or operational phase emission calculations include the new boiler. These emissions should be included in the overall calculations.

On **page 7** of the project description it indicates there would be "no net increase in emissions" from the new boiler as the use of fuel gas to generate steam would occur through a diversion of the same fuel gas that normally is used to generate electricity. This raises two questions, first if electricity is not being generated on site – won't electricity need to be purchased from an offsite source? Offsite electrical generation would have emissions associated with it which should be addressed and included in the calculations as applicable. Secondly, how is the refinery going to guarantee that both boilers (one for steam and one for electricity) will not be operating simultaneously? There must be some mechanism in place to prevent both boilers from being used at the same time if "no net increase of emissions" is to be assumed. The applicant will need to provide an explanation acceptable to the APCD in order for these emissions to be excluded from the operational phase emission calculations. In addition, the construction of the boiler should be included in the construction phase emission calculations.

As indicated on **page 7** – 7,450 gallons/day of make-up water will be needed for the new steam boiler operations. Emissions from water pumping and handling should be included in the operational emission calculations for both criteria pollutants and greenhouse gases.

Page 7 - The project description indicates that aluminum dome roofs will be installed on two of the refineries existing crude oil tanks. The emissions from the construction of these two dome roofs should be included in the construction emissions since these roofs will be needed to support the handling of the heavier crudes. After the existing crude tanks are retrofitted with domed roofs will the tanks be placed on the refinery vapor recovery system? And if so, is that system adequate to handle the additional load or will modification to the vapor recovery system be required?

Page 8- Fire Protection and Safety System – it was not clear from the description if new fire water pump(s) will be part of this system or not. If so, emissions from routine maintenance and testing of the pump(s) should be included in the operational phase emission calculations.

Page 8 - Internal unpaved roadways should be maintained to prevent fugitive dust generation. Newly constructed roadways and parking areas should be paved or maintained to minimize dust. Fugitive dust from unpaved roadways should be included in operational phase emission calculations.

Page 10 – Parking areas and roadway leading to the new facility should be paved or treated to prevent fugitive dust.

Page 10 – Was the demolition and removal of 1300 feet of existing track included in the calculations? Offsite hauling for disposal or recycling of any materials should be included in the calculations including the final destination, number of trips and length of trips.

Page 11 – From the construction schedule it does not appear the construction calculations included the construction of the new boiler, dome roofs for the crude tanks, or a refueling station for the locomotive (page 12). In order to accurately assess emission impacts from construction, all emission sources need to be included in the construction calculations. As detailed on page 15, pursuant to CEQA evaluation, the effects must take into account the whole action involved, including direct, indirect and cumulative impacts of construction and operations.

Page 23 – Initial Study – Air Quality Section
Section (b) While it appears that the district fugitive dust threshold will not be exceeded, SLO County is non-attainment for State PM standard, so measures should be implemented to reduce dust to the extent feasible. Additional mitigation measures may be required once all construction emissions have been quantified.

The last paragraph under Section (b) states "*the project would generate an increase in operational air emissions from locomotives transporting crude oil in rail tankers along the new rail spur, unloading of crude oil from rail tankers at the facility and use of facility equipment including a new heating system, pumps, compressors and* ***tank trucks*****."**

- First it is not clear where the tank trucks would be used. Use of tank trucks was not discussed in the project description. This should be explained and associated emissions should be incorporated into the analysis.
- On page 7 the project description indicated there would be "no net increase" in emissions from the new boiler, here it indicates there would be an increase. Please explain.

Section (d) sensitive receptors – A screening health risk assessment should be completed for the proposed project.

Section (e) odors – The Refinery Odor Control Plan will need to be updated to include the proposed project. The Plan should be submitted to the APCD for review and approval prior to the issuance of any land use permits.

Appendix A

Construction Phase Emission Calculations – (applies for both criteria and GHG emissions)
Based on the data presented in Appendix A it is unclear if the following emission sources have been included in the construction calculations. If not, the calculations should be revised to include these sources. Until such time as these emissions have been quantified it is not possible to adequately

determine the construction impact from this project. Once corrected, the air quality analysis should be forwarded to the APCD for review.

Additional aspects to evaluate and include in the air quality analysis:

1. Offsite hauling of demolition materials including but not limited to old rails associated with replacement or modification to the mainline turnout.
2. New boiler
3. Power line extension
4. Dome roofs for the crude tanks
5. Refueling station for the locomotive
6. Boundary fence
7. Construction workers commute trips

- Calculations – District staff recommends that a spreadsheet be developed that details all the project components and emissions associated with each component. Table A-1 in Appendix A is a good start as it lists out certain activities (demolition, grading, soil transport, contraction pipeline, and construction rail line). However it clearly does not include all of the items listed above. This table should be expanded to show emission factors and associated emissions for each project component.

- Mitigation – even though the calculations do not show a threshold exceedance of fugitive dust, the Nipomo area is a non-attainment area for PM so measures should be implemented to reduce dust to the extent feasible.

- Mitigation – in addition to the mitigation measures outline in Appendix A, District staff recommends the following measure be included as condition of approval for this project.

    - NOA - <u>Asbestos / Naturally Occurring Asbestos</u>
      Naturally occurring asbestos (NOA) has been identified by the state Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified areas throughout the County where NOA may be present (see the APCD's 2009 CEQA Handbook, Technical Appendix 4.4). If the project site is located in a candidate area for Naturally Occurring Asbestos (NOA), the following requirements apply. Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if NOA is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the APCD. If NOA is found at the site the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. If NOA is not present, an exemption request must be filed with the Air District. More information on NOA can be found at
      http://www.slocleanair.org/business/asbestos.php

- Demolition - Demolition of Asbestos Containing Materials
  Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during demolition or remodeling of existing buildings. Asbestos can also be found in utility pipes/pipelines (transite pipes or insulation on pipes). If building(s) are removed or renovated; or utility pipelines are scheduled for removal or relocation, this project may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP). These requirements include, but are not limited to: 1) notification requirements to the APCD, 2) asbestos survey conducted by a Certified Asbestos Inspector, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at (805) 781-5912 for further information.

- Permits - Construction Permit Requirements
  Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit. Operational sources may also require APCD permits.

  The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2009 CEQA Handbook.

  - Power screens, conveyors, diesel engines, and/or crushers
  - Portable generators and equipment with engines that are 50 hp or greater
  - Electrical generation plants or the use of standby generator
  - Internal combustion engines
  - Rock and pavement crushing
  - Unconfined abrasive blasting operations
  - Tub grinders
  - Trommel screens
  - Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc)

  To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

Operational Phase Emission Calculations – (applies for both criteria and GHG emissions)

- It is not clear from the data presented in Appendix A, if the calculations include the following operational emission sources. If not the calculations should be revised to include these sources. Until such time these emissions have been quantified it is not possible to adequately determine the operational impacts from the project.

    1. Emissions from the carbon beds when the beds are regenerated.
    2. Operation of the new boiler.
    3. Provide an accounting of all sources that were included in the fugitive emissions calculations.
    4. Pumping of water 7,450 gallons/day for boiler, page 7 (discussed above)
    5. Fugitive from unpaved roadways should be included in operational emission calculations.
    6. Locomotive – there is a category in Table A-7 for locomotive emissions. It is not clear if this includes operation while on the site. Both offsite and onsite operation should be included. Estimate of onsite emissions should be listed separately from offsite emissions.
    7. Emissions from the haul train over the entire length of the trip. Trip mileage and associated emission calculation should include round trips (to and from the crude source).
    8. Emissions from the train trips should be broken out to show emissions in San Luis Obispo County, and emission outside of San Luis Obispo County including emission **outside the state of California**.
    9. Emission from employee commute trips.
    10. Emissions from routine maintenance and testing of fire water pump(s) if new pump(s) are to be installed at the unloading rack.
    11. Offsite electric generator.
    12. Methane and other light hydrocarbons released from the crude when it is heated.

- It is not clear from the data present in table A-5 what is meant by the heating system. More specific information must be provided (size of the boiler, emission control equipment on the boiler etc.)

- There is not enough information provided to verity any of the operational phase emission calculations. As indicated above assumptions, emission factors and supporting calculations (i.e. spreadsheet) should be provided.

- The applicant will need to secure an Authority to Construct Permit from the APCD prior to the start of the project.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 805-781-4667.

Sincerely,

Melissa Guise

Melissa Guise
Air Quality Specialist

MAG/ksj

cc: Mr. Jim Anderson

Attachments

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