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Submitted Via E-Mail: p66-railspur-comments@co.slo.ca.us

Jan. 27, 2014

TO: Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408-2040
ATTN: Murry Wilson, Environmental Resource Specialist

SUBJECT: PHILLIPS 66 COMPANY RAIL SPUR EXTENSION DEIR, (SPUR DEIR)
SLOCo. File DRC2012-00095
RE: Public Comments on Adequacy, Completeness, and Objectivity of DEIR
PART 1

CC: San Luis Obispo Air Pollution Control District
Melissa Guise, 3433 Roberto Court, SLO, CA 93401-7126 805-781-4667 **info**@slocleanair.org
Central Coast Regional Water Quality Control Board (RWQCB) Regn.3
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Andrew Christie, Sierra Club, Santa Lucia Chapter, sierraclub8@gmail.com
P.O. Box 15755, San Luis Obispo, CA 93406

Dear Mr. Wilson,

Following are the comments of the Fracking-Oil & Gas Committee, Angeles Chapter of the Sierra Club on the Draft Environmental Impact Report for the proposed project, Rail Spur Extension (Spur Project). The Project appears to be a segmented (piecemealed) component of an overall central California project with several "components" (including the All-American Pipeline, other north-south pipelines, the Rail Terminal [the Project], a refinery processing center [2012-13 project] connecting California refineries, and marine terminals for crude and other oils suitable for Pacific export with or without relief of bans. Various components have been mentioned as restricted to some stated capacity but are not physically restricted to the stated capacity and could easily be altered without further public review. The Project operates as a system and must be presumed to be balanced, thoughtful, and reasonable; the system includes:

1. Loading of crude oil from some distant sources
2. Transport via tank cars from the loading to the SMR
3. Unloading (the Project), storing, processing, and transport via pipeline(s), and
4. Receipt of semi-/un-processed crude oils anywhere a pipeline connect to in the San Joaquin Valley and beyond and in the SF Bay Area (for processing or further processing).

By segmenting the various elements, their individual impacts can be trivialized although taken as a whole impacts may be wide-ranging and significant for California. SIER-1

Throughout the DEIR, references are made to various crudes but the DEIR does not state what the feedstock specifications will be and thus allows any feedstock to be delivered for processing or passing-through the SMR and does not restrict the "Project" to only SMR and processing but allows feedstocks to be offloaded at Santa Maria and delivered virtually anywhere in California and perhaps around the Pacific shores via Estero Bay tanker facilities. SIER-2

The "Project" has a stated limit of five trains (400 tanker cars) per week although the maximum physical capacity of Spur and pipelines indicate much higher flowthrough could easily be accommodated than that stated, and thereby cumulative effects of a higher but unregulated flowthrough could easily contribute to or induce other projects. The comments clearly indicate that a simple alternative of reducing physical facilities of the proposed Project to those needed to meet the current refinery requirements would SIER-3

eliminate many as yet unassessed impacts, especially on air quality. Similarly simple statement of feedstock specifications (API gravity, sulfur percentage, VOC compositions, etc.) would focus the assessments and reviews to those specific to the SMR, e.g., APIg <20° and S% >2.0% rather than leaving the feedstock specifications as virtually unlimited to Dakota and Canadian crudes (API 10-40, S% 0.2-5+%). Without the specifications and physical capacities of only for SMR (<50,000 bpd), the unloading facilities would relieve a bottleneck in the logistics transfer of >100,000 bpd of crude oil for use of US crude oils. SIER-3

The SMR can easily process the diluted bitumen from the tar sands of Canada, while the North American (specifically excluding Alaska) crudes could not be reasonably processed through SMR without major changes or gross inefficiencies. SMR doesn't make vehicle fuels, but with Bakken crudes and some "minor/exempt" physical changes after the unloading facilities were approved, the system could. Before refinery changes, Bakken crudes could be immediately shipped by one of the two pipelines (along with others) to the San Joaquin Valley and Bay Area for refining and via Bakerfield pipelines to the LA Region. SIER-4

Throughout the DEIR, the preparers have avoided the outgoing capacities of tanks-pumps-pipelines compared to the low-ball statements for the incoming supplies, which have immediately raised concerns as to why the secrecy and whether the preparers are reasonable and objective, given this clear lack of objectivity or competence. What are the maximum capacities of the pumps, sizes/capacities of the pipelines, and the throughput of outgoing storage tanks? SIER-5

Although SLOCo documents have mentioned "a pipeline" between the SMR and Phillips66 Rodeo Refinery, two different pipeline routes have been shown (e.g., Santa Clara and San Joaquin Corridors), and other pipelines (e.g., via All American Pipeline) can be accessed via existing or minor cross-connections. These pipelines can access the full range of "North American Crudes" available via Crude-By-Rail logistics. Using selective de-bottlenecking and logistic cross-connections, Californian pipeline systems can be fully responsive to pricing, specifications, and volumes with "categorically exempt" "minor projects" for Californian needs and eventually those of the Pacific Basin for products, semi-processed crudes, and regular crudes. Other potentially CEQA-exempt projects would be replacement of 10-inch with 12- or 16-inch pipelines along the same alignments as long as the logistics capacities and inducements are not subject to review. SIER-6

The entire hazard review cannot be evaluated as the vapor pressure and flow character of the tanker fluids and feedstock are unknown, and calculations appear to understate risks and substitute probability for actual analysis of impacts. Given the lack of specifications for the incoming crude oils, no reasonable nor objective assessment of hazards and risks can be provided and those that have been do not include basics as to the True or Reid Vapor Pressures, Temperatures, and VOC contents for the crudes, minimal on-rail travel times, and potential for gas-vapor headspace "bubbles" forming and risks for instantaneous flashing of explosive gases during top-side offloading, either the preparers are lacking objectivity or are not experienced in the hazards of gas separation in crude-by-rail oil issues. SIER-7

Although not yet directly associated with maritime movements of crude oils, delivery of crude oils to the SMR Rail Spur rail-to-pipeline unloading facility opens the entire issue of transshipments of crude-by-rail>crude-by-pipe>crude-by-ship to the idled Santa Barbara-San Luis Obispo marine terminals which are underway in Washington State and British Columbia. Once unloaded into a pipeline, the "excess capacity" of the unloading and pipeline systems can work in concert with delivery of central US/Canadian crudes to the north Pacific refinery markets in the US and in the western Pacific. A thorough assessment of the unloading Project capacities has not been done compared to the pipelines and pumps between Monterey Bay and Point Conception to the San Joaquin Valley. SIER-8

The sector assessments within the DEIR use "compliance mitigation" for potential adverse effects which requires that all of the planning and designs can be done after the FEIR is certified, and that the FEIR shall assume that nothing unusual will arise regarding seismic liquefaction being mitigated by "thorough engineering and geological investigations". Although the DEIR appears sometimes, myopic, the liquefaction risks figure covers virtually the entire County rather than cropped down to the Project area/region. When enlarged, the figure shows that the Project lies at or in a high risk liquefaction zone, but no geotechnical studies were prepared or provided for the DEIR, even though the area has been the subject of contaminated groundwater under the Project area. SIER-9

Many additional mitigation measures are required to assure safety and elimination of hazards and spill risks within the Project area, on the Mainline Sidings.

An additional alternative to that of fewer trains per week is provided, so as to match the maximum physical capacity of unloading to that of the SMR processing at about 50,000 bpd by eliminating one whole set of tracks for the unloading facilities or reducing the length of the unloading facility for four-five tankers at a time. SIER-10

The restricted perceptive of the preparers also is reflected in their avoidance of the issues regarding crude-by-rail that have arisen in the San Francisco-SanPablo-Benicia-Delta and in Wilmington areas compared to those raised in Bakersfield and now Santa Maria. Major crude oil logistic companies appear to be searching for access first to the California refineries and secondly to the Pacific sealanes. Santa Maria-San Luis Obispo-Morro Bay satisfies most objectives and avoids the controversies elsewhere. Thus the better organized, educated, and supported opposition has pushed crude-by-rail proponents to the rural and less organized Santa Maria, and this could be and should be reviewed in conjunction with environmental justice considerations. SIER-11

As indicated in Appendix J, no preparer has clear, direct experience in air quality, modeling, or other air resources sector (other than mechanical engineering); hazardous materials is prepared by a climatologist with no apparent experience in oil fires and explosions, and no State Certification/Registration is indicated for the preparer of "Geological Resources". Only one preparer i(outside subcontractor) is shown as a professional engineer although others claim more than 20 years of experience. SIER-12

In light of the above, we urge adoption of the No Project Alternative or withdrawal of the existing DEIR or an extensive revision and recirculation of a Subsequent EIR (for replacement of the existing DEIR).

Thank you for the opportunity to comment,

Dr. Tom Williams, Co-Chair
Fracking-Oil & Gas Committee
Angeles Chapter, Sierra Club

DETAILED COMMENTS - PART 1

Page Number/Paragraph Number and Text

SC-AC/FOG Committee Comments

1-6/4 The San Luis Obispo County Air Pollution Control District (SLOAPCD) is the agency responsible for issuance of a Permit to Construct (PTC) and a Permit to Operate (PTO), both of which would be required for the Rail Spur Project. To fulfill its obligations as a responsible agency, the SLOAPCD will rely on information contained in this EIR as part of any PTC/PTO permitting process.

1-6/6 The RWQCB will use the EIR for decision-making regarding any updates to the refinery's National Pollutant Discharge Elimination System (NPDES) permit and for any stormwater construction general permit.

SIER-13

Contacts with and responsibilities of the responsible agencies have not been specifically identified, especially with preparation and review of the DEIR.

No responsibility for the Mitigation and Monitoring Plan has been assigned to any other agency (only to the County) although especially the APCD has clear responsibilities.

The DEIR must be revised, and APCD incorporated into the Project sizing and maximum capacities of the facilities before it goes to the APCD for permitting which requires far more details than those provided in the County's DEIR.

ES-5/3 The Rail Spur Project would not affect the amount (throughput volume) of material processed at the refinery. Throughput levels at the refinery are capped by the County of San Luis Obispo Department of Planning and Building and by the San Luis Obispo County APCD.

The proposed project may not affect the throughput of the refinery process but can greatly increase throughput of the export pipeline system(s) and associated pump stations and tankage without affecting the processing of the SMR.

No specifications have been provided for the delivered crude oils, and a wide range of crudes could be delivered in part for the SMR heavy crude processing for transport to the RdR and in part for direct transport from SMR to RdR by pipeline. Although the refinery may be limited, no specific limits are assigned to the pipeline systems.

As the rail delivery/unloading system has a maximum physical capacity of more than (2 trains/d x 45-52,000 bbl/d =) 90-105,000 bpd, the refinery may remain at roughly 48,000 bpd capacity, while the transportation system could convey 48,000 bpd of process crude and 42-57,000 bpd of lighter crude delivered by the "second train" every day rather than the arbitrarily stated limit of five trains per week.

No information is provided regarding the maximum capacities of the export pipeline system and related pipelines, pumps, and tanks from the unloading facilities through the refinery and into and through the pipeline(s) to the RdR and through various connections to such a system through the San Joaquin Valley.

SIER-14

As prepared the DEIR does not provide or use maximum physical capacities within the descriptions of the Project, its related facilities, and the outgoing pipeline systems. Arbitrary limits of five trains per week can be easily altered and change many of the onsite and offsite impacts of the Project and may also be related to other physical facilities and operations from Santa Maria to Rodeo, California, including the San Joaquin Valley.

If Bakken crudes are used the SMR would no longer be effective and reasonable to use and SMR would become a transportation hub. If SMR remains operational, then a heavy sour crude would be required (at least 50% of the time) and based on current pricing that would be the DilBit, tar sands crude found along the same railroad lines.

The maximum throughput and RVP/TVP of the crude oils have not been provided and only generalized estimates of emissions based on outdated refinery emissions has been used rather than more current throughput/RVP/TVP calculations for the floating roof and cover floating roof tanks .

The DEIR has not been but must be revised and disclose all aspects of the sources (e.g., gravities, S%, RVP/TVP, VOC composition,etc), delivered crude specifications, and the maximum capacities of all transportation and refinery transfer facilities/system.

Such revisions are massive and require withdrawal of the existing DEIR and recirculation of a revised comprehensive DEIR at a later date.

More to come

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DETAILED COMMENTS PART 2

Page Number/Paragraph Number and Text

SC-AC/FOG Committee Comments

Alternatives (See also Alternatives, Sec. 5)
ES-10/8 **Reduce Train Deliveries**
With this option the Rail Spur Project would be built and operated as proposed, but the SMR would receive only a maximum of three unit trains per week instead of the proposed five per...11... week... All of the construction and operational activities would be the same as the proposed project, which are discussed in Chapter 2 of the EIR.
Such a operational reduction could easily and arbitrarily be changed at anytime in the future and avoids the basic approach for all emissions and throughput calculations based on maximum physical capacities.

SIER-15

ES-12/1 **Reduce Train Deliveries** All of the construction impacts would be the same as the Rail Spur Project...Operational impacts in all the other issue areas would remain the same...not result in any new impacts not identified as part of the Rail Spur Project.
Operational changes herein are not related to physical facilities and establish a very large excess capacity for the proposed physical facilities. Thereby the "Reduce...Deliveries" is not an adequate alternative but can be made into one by sizing the physical facilities to meet the throughput of 3 x 80 cars = 240 car loads per week or 35 car loads per day (vs proposed capacity of 160cars/day on 20 unloading points), requiring only 1.2 car load/hour and one-two unloading points (20 x 1.8 points).
Therefore, we request that the entire "Reduce Train Deliveries" be revised from 20 unloading points to two points for a daily unloading of 36 cars (240 tank cars/week) on a continuous basis and reducing the total land area of less than half of the total required for the proposed project and the proposed reduced alternative.
The two approaches of statement- or design-driven alternatives demonstrates the lack of objectivity on the part of the applicant, preparers, and agencies and support of eventual administrative changes of capacities without public reviews.
The DEIR must be totally revised and recirculated for public review including an "Environmentally Superior Alternative" with a physical facility of say 25% of the physical area involved based on the claimed local SMR requirements, only.

SIER-16

ES-12/3 ...If the County is preempted...then the reduced rail delivery alternative would be the next environmentally superior alternative after the No Project Alternative since it would reduce the severity of the Class I air impacts.
Air emissions calculations cannot be objectively undertaken based on the physical facilities being operated at less than 50% of their maximum throughput from unloading. As the Applicant as

SIER-17

not provided the transport capacities of the pipeline(s) systems from the SMR to the RdR, the reviewer must assume that two pipelines (SantaClara and SanJoaquin corridors) exist and can be operated and with assumed diameters of 12-16in would have sufficient capacity to carry more than 100,000bpd of processed heavier and unprocessed light Bakken crude oils. SIER-17

ES-12/4 If the County is not preempted, the reduced rail delivery alternative would offer no advantage over the Rail Spur Project in terms of NOx, ROG, and DPM emissions since these emissions could be fully mitigated...offer some very minor advantages over the Rail Spur Project in terms of hazards, noise, GHG emissions and health risk...reduce the likelihood of a train accident, reduce the exposure of sensitive receptors to train unloading noise, and reduce GHG and air toxic emissions...slight reductions would result since fewer trains would be delivered to the SMR. However, all of these impacts would be less than significant for both the reduced rail delivery alternative and the Rail Spur Project.

/5 Therefore, even if the County is not preempted, the reduced rail delivery alternative would offer a very slight environmental advantage over the Rail Spur Project and would be considered the next environmentally superior alternative after the No Project Alternative.

As operational restrictions can be interpreted quite differently from those of physical changes, the logical alternative for lower throughput would be to reduce the length of the offloading facilities to five car spaces on either side or eliminating one side all together and either would reduce the overall environmental effect of the facilities and various related elements. Assuming one sided configuration, the maximum throughput capacity would be reduced from 7 x 2 trains per week (and about 100,000 bpd) to 7 x 1 train per week(about 50,000 bpd) and thereby remain effective in providing the full 48,000 bpd regulated capacity of the SMR and current pipeline transport capacities. SIER-18

Alternatives do not consider the reduction in physical capacities and therefore alternative considers are inadequate if not incomplete. Having written restrictions on capacities rather than using the maximum physical capacities of the SMR facilities, including transportation is not reasonable and objective for assessment and comparisons of impacts.

The DEIR is incomplete, inadequate, and lacks objective comparisons without the half-physical capacity requested herein. The Applicant must review the overall maximum physical capacity of the current facilities and reduce the physical plant down to that which could achieve the maximum processing throughput of say 50,000 bpd, either by eliminating one entire track unloading side or reducing the length to half current with two sided unloading.

2-1/1 Trains would deliver crude oil to the SMR for processing.

Central issue for the entire DEIR is whether all crude oil is delivered to the Santa Maria Refinery (SMR) for processing which would require that the crude oil have specifications appropriate to the refinery. Based on the various references to the use of any "North American Crude" (NAC), but excluding Alaskan, and the Applicant's and DEIR emphasis focused on the economic viability and profitability, the SMR would receive both Bakken Shale (BSC) and Canadian Tar Sand (CTS) crude oils. Although the CTS is not suitable for direct rail or pipeline transport, CTS has been and can be diluted with various components of BSC so that it can be pumped by pipelines, transferred to tanker cars, and remain fluid at ambient temperatures for unloading; this blended crude is diluted bitumen or DilBit (dilbit) in the industry.

Continuing references to BSC has raised many issues regarding the suitability of the BSC for "processing" by SMR as it is too light (API Gravity [APIg] >30) and too sweet (Sulfur, <1%) for the current processing facilities and the resulting products of the SMR.

The entire Project Description and assessment is vague, inadequate and incomplete and does not fully disclose the nature of the project and prospective changes required in the near future (=piece-mealing/segmentation).

SIER-19

If any crude oils (crudes) transported to SMR then the Spur Extension must be considered as an initial step in the transformation of SMR to a fully functional refinery with a range of hydrocarbon products similar to that of any in the San Francisco Bay-Delta or Los Angeles industrial zones. If crudes remain specific to the current SMR, then only the CTS of those mentioned in the DEIR would be delivered, processed, and transported to the Rodeo Refinery (RdR), which is not the current description of the Project.

As written the DEIR is not specific as to the feedstock crudes, but could allow some CTS to be processed through the SMR while the BSC could be transferred directly to the existing pipeline(s) for transport to RdR, without any processing at SMR.

The Project Description and assessment is fundamentally flawed as errors of commission are purposefully included so as avoid public review and full disclosure and to distort any assessment of impacts and mitigation.

The entire Project Description and assessment requires detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

2-1/1 ...the existing rail spur currently on the southwest side of the Santa Maria Refinery (SMR)...in unincorporated San Luis Obispo County California (see Figure 2-1 [p.2-2]).

The existing rail spur from the UPRR siding at Santa Maria operates for the transfer of coke/sulfur products of the processing at SMR. Although one reference is included elsewhere, the existing spur is to be replaced by the Project and two new coke spurs to replace the existing. Although the replacement spurs are part of the project they are not functionally or physically described as part of the "Project".

Therefore the Project Description and assessment is incomplete with regard to an adequate description of all rail related project components. Concerns arise as the coke spurs were not included in the recent refinery upgrades and increases project and are now included as part of a inadequately defined feedstock project, generally having little to do with SMR products.

As written the DEIR is not specific as to the physical facilities and their capacities and fluid compositions.

SIER-20

The Project could allow some CTS to be processed through the SMR, while the BSC could be transferred directly through the existing pipeline(s) for transport to RdR and beyond without any processing at SMR.

The Project Description and assessment is fundamentally flawed as errors of commission are purposefully included so as avoid public review and full disclosure and to distort any assessment of impacts and mitigation.

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2-1/2 ...designed to accommodate unit trains and manifest trains.

Unit trains consist of approximately 80 tank cars and associated locomotives and other supporting cars that stay together as one assembly.

Manifest trains...are not fully dedicated as are unit trains.

SIER-21

Manifest trains may deliver one or more cars to the refinery...

A verbal/text reference to 80 car unit trains is not binding on anything and can be easily changed at any moment. Similarly discussion of unit and manifest trains is irrelevant to the physical capacities of the UPRR siding and the maximum capacities of the coke spur and the Spur Extension Project. As UPRR often carries unit trains of up to 125 cars, the limitation to 80 cars without reference to regulatory weight or other limits is totally inadequate if not incomplete.

As is commonly done for water and air emissions, the maximum physical capacity of an efficient and well managed siding and spurs must be provided and used rather than a operational statement of 80 tank cars, two buffer cars, and two-three locomotives. No such analyses has been done and therefore the maximum train size (either as unit or manifest) must be assumed to be 125, including five non-tankers and 120 tankers.

SIER-21

As written the DEIR is not specific as to the feedstock crudes, but could allow some CTS to be processed through the SMR while the BSC could be transferred directly to the existing pipeline(s) for transport to RdR, without any processing at SMR.

The Project Description and assessment is fundamentally flawed as errors of commission are purposefully included so as avoid public review and full disclosure and to distort any assessment of impacts and mitigation.

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2-1/4

• Allow the refinery to obtain a full range of competitively priced crude...source raw material from North American sources...served by rail.

• Extend the existing rail spur within the refinery and install...transfer crude oil from rail cars to the existing refinery storage tanks for processing.

• Avoid and minimize...impacts, and mitigate any unavoidable impacts to the maximum extent feasible.

• Develop a project that is consistent with the objectives of the San Luis Obispo County General Plan and Local Coastal Program.

• Design, construct, and operate a project that complies with all local, state, and federal regulatory requirements.

• Maximize the use of existing infrastructure and resources to support the economic vitality of the County and State.

A statement of avoid, minimize, and mitigate any unavoidable...maximum extent feasible requires so many detailed definitions to make it operational as to be irrelevant and self-serving to promote the Project, not objective, quantified and therefore not adequate. As the Project Description and assessment is flawed, no "unavoidable" effects can be assessed nor mitigated, while "feasible" is equal to none as feasibility has an implied economic aspect and since the SMF is one of the lowest profitable operating centers for Phillips66 we must assumed that "Zero is a vey good number".

SIER-22

Compliance of designs and operations of the Project cannot be reviewed and assessed as the Applicants requirements are not provided in quantitative terms, crude throughput, and composition (no Project Specifications), such as APIg#, sulfur content, barrels per hour unloaded, barrels/hour processed, and barrels/hour transported to RdR.

As written the DEIR is not specific as to anything regarding the County's economic viability, and therefore the DEIR is incomplete as the DEIR does not assess a stated objective of the Project and therefore no adequate alternatives can be presented with regard to such. If the SMR acts merely as a transportation hub for Bakken Shale Crudes (BSC) to the Rodeo Refinery and to the marine terminal in Estero Bay the economic vitality of the County may be altered compared to that of an eventual full range refinery for the Central California Coast using either BSC or CTS.

The Project Description and assessment is fundamentally flawed as errors of commission are purposefully included so as avoid public review and full disclosure and to distort any assessment of impacts and mitigation.

The DEIR does not provide assessment of compliance with the stated Project's objectives and therefore cannot provide the basis for development of complete and adequate alternatives.

The entire Project Description, compliance with the stated objectives, and alternatives development require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-22

2-3/1 The SMR was built on the Arroyo Grande mesa...(see Figure 2-1).
2-3/3 The SMR and the Rodeo Refinery, linked by a 200-mile pipeline,...(see Figure 2-2)...mainly processes heavy, high-sulfur crude oil.

The figure does not show where the Arroyo Grande mesa occurs and refinery location on it.
In some figures the SMR is oriented to true north while in others to "Plant North".
The 200-mile pipeline in the figure differs from that used in the Refinery Upgrade DEIRand other documents and cannot be reviewed or used in assessment without diameters, capacities, and pressures, especially for spill and flashing fire/explosion.
"Mainly" suggests that other crude oils are now delivered to SMR without any compilation as to current crude oil specifications for incoming feedstocks, nor for specifications of the outgoing semi-processed crude oil going to RdR.
The DEIR's map of the connecting pipeline differs from other provided elsewhere for the connector pipeline(s) between SMR and RdR, one across the Coast Range and up the San Joaquin Valley (east entry) vs one up through valleys of the Coast Range into the Santa Clara Valley under the East Bay coastline to RdR (west entry). The DEIR does not address the full range of pipelines connected to the SMR which could transport unprocessed or semi-processed crude oils delivered to SMR by rail and then dispensed to the San Joaquin Valley, SF Bay area, or even LA region.

SIER-23

As written the DEIR is not specific as to the feedstock crudes, but could allow some CTS to be processed through the SMR while the BSC could be transferred directly to the existing pipeline(s) for transport to RdR, without any processing at SMR.

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DETAILED COMMENTS PART 3

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SIER-24

2-1/1 ...the existing rail spur currently on the southwest side of the Santa Maria Refinery (SMR)...in unincorporated San Luis Obispo County California (see Figure 2-1 [p.2-2]).

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SIER-25

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The Project could allow some CTS to be processed through the SMR, while the BSC could be transferred directly through the existing pipeline(s) for transport to RdR and beyond without any processing at SMR.

The Project Description and assessment is fundamentally flawed as errors of commission are purposefully included so as avoid public review and full disclosure and to distort any assessment of impacts and mitigation.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

2-1/2 ...designed to accommodate unit trains and manifest trains.

Unit trains consist of approximately 80 tank cars and associated locomotives and other supporting cars that stay together as one assembly.

Manifest trains...are not fully dedicated as are unit trains.

Manifest trains may deliver one or more cars to the refinery...

A verbal/text reference to 80 car unit trains is not binding on anything and can be easily changed at any moment. Similarly discussion of unit and manifest trains is irrelevant to the physical capacities of the UPRR siding and the maximum capacities of the coke spur and the Spur Extension Project. As UPRR often carries unit trains of up to 125 cars, the limitation to 80 cars without reference to regulatory weight or other limits is totally inadequate if not incomplete.

As is commonly done for water and air emissions, the maximum physical capacity of an efficient and well managed siding and spurs must be provided and used rather than a operational statement of 80 tank cars, two buffer cars, and two-three locomotives. No such analyses has been done and therefore the maximum train size (either as unit or manifest) must be assumed to be 125, including five non-tankers and 120 tankers.

SIER-26

As written the DEIR is not specific as to the feedstock crudes, but could allow some CTS to be processed through the SMR while the BSC could be transferred directly to the existing pipeline(s) for transport to RdR, without any processing at SMR.

The Project Description and assessment is fundamentally flawed as errors of commission are purposefully included so as avoid public review and full disclosure and to distort any assessment of impacts and mitigation.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

2-1/4

• Allow the refinery to obtain a full range of competitively priced crude...source raw material from North American sources...served by rail.

• Extend the existing rail spur within the refinery and install...transfer crude oil from rail cars to the existing refinery storage tanks for processing.

• Avoid and minimize...impacts, and mitigate any unavoidable impacts to the maximum extent feasible.

SIER-27

• Develop a project that is consistent with the objectives of the San Luis Obispo County General Plan and Local Coastal Program.

• Design, construct, and operate a project that complies with all local, state, and federal regulatory requirements.

• Maximize the use of existing infrastructure and resources to support the economic vitality of the County and State.

A statement of avoid, minimize, and mitigate any unavoidable...maximum extent feasible requires so many detailed definitions to make it operational as to be irrelevant and self-serving to promote the Project, not objective, quantified and therefore not adequate. As the Project Description and assessment is flawed, no "unavoidable" effects can be assessed nor mitigated, while "feasible" is equal to none as feasibility has an implied economic aspect and since the SMF is one of the lowest profitable operating centers for Phillips66 we must assumed that "Zero is a vey good number".

Compliance of designs and operations of the Project cannot be reviewed and assessed as the Applicants requirements are not provided in quantitative terms, crude throughput, and composition (no Project Specifications), such as APIg#, sulfur content, barrels per hour unloaded, barrels/hour processed, and barrels/hour transported to RdR.

SIER-27

As written the DEIR is not specific as to anything regarding the County's economic viability, and therefore the DEIR is incomplete as the DEIR does not assess a stated objective of the Project and therefore no adequate alternatives can be presented with regard to such. If the SMR acts merely as a transportation hub for Bakken Shale Crudes (BSC) to the Rodeo Refinery and to the marine terminal in Estero Bay the economic vitality of the County may be altered compared to that of an eventual full range refinery for the Central California Coast using either BSC or CTS.

The Project Description and assessment is fundamentally flawed as errors of commission are purposefully included so as avoid public review and full disclosure and to distort any assessment of impacts and mitigation.

The DEIR does not provide assessment of compliance with the stated Project's objectives and therefore cannot provide the basis for development of complete and adequate alternatives.

The entire Project Description, compliance with the stated objectives, and alternatives development require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

2-3/1 The SMR was built on the Arroyo Grande mesa...(see Figure 2-1).

2-3/3 The SMR and the Rodeo Refinery, linked by a 200-mile pipeline,...(see Figure 2-2)...mainly processes heavy, high-sulfur crude oil.

The figure does not show where the Arroyo Grande mesa occurs and refinery location on it.

In some figures the SMR is oriented to true north while in others to "Plant North".

The 200-mile pipeline in the figure differs from that used in the Refinery Upgrade DEIRand other documents and cannot be reviewed or used in assessment without diameters, capacities, and pressures, especially for spill and flashing fire/explosion.

"Mainly" suggests that other crude oils are now delivered to SMR without any compilation as to current crude oil specifications for incoming feedstocks, nor for specifications of the outgoing semi-processed crude oil going to RdR.

The DEIR's map of the connecting pipeline differs from other provided elsewhere for the connector pipeline(s) between SMR and RdR, one across the Coast Range and up the San Joaquin Valley (east entry) vs one up through valleys of the Coast Range into the Santa Clara Valley under the East Bay coastline to RdR (west entry). The DEIR does not address the full range of pipelines connected to the SMR which could transport unprocessed or semi-processed crude oils delivered to SMR by rail and then dispensed to the San Joaquin Valley, SF Bay area, or even LA region.

SIER-28

As written the DEIR is not specific as to the feedstock crudes, but could allow some CTS to be processed through the SMR while the BSC could be transferred directly to the existing pipeline(s) for transport to RdR, without any processing at SMR.

The Project Description and assessment is fundamentally flawed as errors of commission are purposefully included so as avoid public review and full disclosure and to distort any assessment of impacts and mitigation.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

2-3/3 Semi-refined liquid products from the SMR are sent by pipeline to the Rodeo Refinery for upgrading into finished petroleum products.
...(2) solid petroleum coke by rail or haul truck; and (3) solid recovered sulfur by haul truck.
A plot plan of the SMR is shown in Figure 2-3 [p.2-5].
2-4/Fig. 2-2

Pipeline route not same as others;
Insets do not show pipeline routes to the refineries nor boundaries of the refineries,

Detail Corrections -

Tanks shown as true north not NE (Figure 2-4 shows reoriented layout similar to Fig. 2-3);
Railroad shown as Southern Pacific;
No project boundary limits indicated;
No new pipelines indicated connecting to tankage and process units;
No pipeline pump station is indicated;
No new replacement coke/sulfur spurs shown.

No discussion is provided regarding the relocated sulfur/coke spurs which is a required component of the project.

Although the SMR/RdR pipeline is discussed many times, the pipelines, tanks and pumping systems within the SMR are not described, especially as to capacities and connections, nor shown.

No mention is made as to whether unloaded BSC could be directly transferred to the pipeline(s) via connections and tanks in SMR and thence to RdR. SIER-29

As indicated elsewhere, if existing pipelines could handle both the BSC and CTS, the actual maximum physical capacities of the Spur unloading facilities become very important, as also those pipeline transfer points along the entire pipeline(s) for the San Joaquin Valley and LA Region and from the RdR to other refineries in the SF Bay and Delta.

As the basis for VOC emissions calculations from crude oils are closely related to APIg differences between the CTS with APIg <20 and BSC with APIg >30. The Project Description and assessment does not provide detailed specifications for the feedstock crudes and thorough physical descriptions as to whether CTS would go through the processing while the BSC may be directly transferred to outgoing pipelines.

The Project Description and assessment must simply eliminate any reference to Bakken crudes and must focus entirely on CTS and other cheap heavy crudes to continue current pre-processing and transport to the RdR.

As written the DEIR is not specific as to the feedstock crudes, but could allow some CTS to be processed through the SMR while the BSC could be transferred directly to the existing pipeline(s) for transport to RdR, without any processing at SMR.

The Project Description and assessment are fundamentally flawed as errors of commission are purposefully included so as avoid public review and full disclosure and to distort any assessment of impacts and mitigation.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

2-6/1 Phillips 66 proposes to extend the existing rail spur on the southwest side of the refinery to add an unloading facility, on-site pipelines, and a restroom (see Figure 2-4 [p.2-7]). SIER-30
Change from southwest to southerly or to southeasterly.

2-6/1 The tracks and unloading facilities would be designed to accommodate trains of approximately 80 tank cars and associated locomotives in unit trains or manifest train configurations.
Therefore the "Unit Train" would be 85 cars long - 80+2+1+2 SIER-31
Reference to 80+cars includes manifest train configuration and conflict with other references.
Poorly-edited text must be revised along with lots of other revisions in the DEIR and recirculate the DEIR.

2-6/1 These trains would deliver crude oil to the facility for **processing**.
Here the trains-delivered crude oil is only for processing which would eliminate the BST from delivery to SMR as it could not be processed through the SMR without major changes and require many changes to existing air pollution permits. SIER-32

Inconsistent text references for processing and crudes must be revised along with lots of other revisions and recirculated.
The Project Description and assessment are fundamentally flawed as errors of commission are purposefully included so as avoid public review and full disclosure and to distort any assessment of impacts and mitigation. Simple questions as to what are the specifications for processing by the SMR rather than just for the pipeline(s) have not been provided or even attempted nor answered.
The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-32

2-6/1 The unloaded material would be transferred to the existing storage tanks via a new pipeline that would be constructed across the existing coke storage area and along an existing internal refinery road.
By going directly to tank storage, the description must also show how the stored unloaded crudes would be only connected to the refinery process and whether the stored crude could be transferred for outgoing pipelines to the San Joaquin Valley and beyond.
The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-33

2-8/2 Currently undisturbed areas temporarily affected during construction would be returned to pre-project conditions following completion of construction...The proposed project would consist of the following components:

- Rail Spur Modifications,
- Mainline Turnout,
- Unloading Facility,
- Unloading System,
- Fire Protection and Safety System,
- Pipeline,

This is not a modification but complete new Rail Spur.
The listing does not include the new replacement Coke spurs, see below.
This project listing is inconsistent with others in the DEIR (no toilet).
This listing includes the "Pipeline" which must include beyond the SMR boundaries. Such inclusion here, would allow future use of this EIR can be used for CEQA compliance for any modifications of the pipeline(s) from SMR to RdR.
The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-34

Coke Tracks (CT1 and CT2) – Two new coke tracks would be installed to service rail loading of coke from the coke area. The new coke tracks are needed since the proposed rail tracks for the crude oil unloading would be placed between the coke piles and the existing coke rail track. By moving the coke rail tracks to the north side of the proposed crude unloading tracks, the front end loader, which is used to load coke into rail cars, would not have to cross the proposed new tracks.
This element of the Project is not adequately or completely assessed especially as to their past and anticipated issues for air quality and groundwater contamination as demonstrated by the current conditions of the coke spur site. Similarly the future facilities seem to have replaced one spur with to spurs and therefore must be considered to double the existing capacities.
The entire Project Description and assessment and those of the coke facilities require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-35

2-9/1 rail spur modifications ...constructing five parallel tracks, each long enough to hold an entire train (as the tracks extend east, some rail tracks would merge)...A line diagram of the rail tracks is shown in Figure 2-5.

SIER-36

The existing rail spur on the southern portion of the property...and would provide a common entry point for the new tracks.

The Existing Spur is for coke loading facilities and connect to the UPRR sidings (172 and 173) and their operations must incorporated into the Project. No quantitative analyses is provided for the maximum car numbers/lengths (not using 60ft per car for 4800ft) along with transferring lengths to demonstrate effects on the Coke Spurs, the UPRR sidings, and other operations of all rail systems and operations between the UPRR northern and southern siding switches. No details given for the north-bound unit trains.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-36

2-9/1 Two tracks would surround an unloading rack and then would come together to form a common track that extends to the east of the loading area to allow for the entire train to be parked off of the mainline track and unloaded.

The system has been designed to allow for up to two full trains to temporarily be on the Refinery Site at one time in case a second train arrives while the first is still being unloaded.

Four Long Tracks = Four Trains

Two Short Spur Tracks = X Trains

UPRR Siding = Y Trains

Maximum physically possible

Change "...in case a ***third*** train

2-9/3 ...mainline and the loading area...“lead” track...long enough for 10 tank cars and the switching locomotives.

A third track...receive a full unit train...unloading racks be occupied by unloading trains.

A fourth track (the “runaround track”) would run the full length of the rail spur and would allow locomotives to return to the front of the facility after dropping off an 80-car train on the unloading tracks

...fifth track...for queuing up empty cars after the unloading process is complete.

2-10/F.2-5 Siding Track, Refinery Spur, Two New Coke Tracks, Five Project Tracks and Bad Order Track

UPRR mainline tracks are not directly connected to the Spur Extension Project as the Sidings (172-3) lie along the easterly side of the mainline, and the existing spur, the project and two replacement loading spurs would connect only to the UPRR Siding not the Mainline tracks.

Mainline and loading/unloading spurs are not directly connected; they are separated by the UPRR siding tracks which lead to the Spurs.

Each train was configured with two pulling and one pushing locomotives and can have two train sets in position at any time - therefore there appear to be sufficient locomotives to move units around for departure without major use of the pass-by tracks.

Switching engines were mentioned also but not provided for and how they will operate compared to three trains with 9 locomotives.

Additional track space is available through the Coke Spurs and Bad Order Tracks.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-37

2-11/6 **2.3.2 Mainline Turnout ...**Unit train service would not require substantial changes to the turnout from the Union Pacific mainline running north-south (NW-SE) adjacent to the refinery.

The preparers do not appear to appreciate that the Mainline has a UPRR siding which would be assumed to be designed for UPRR mainline trains and cars.

The Mainline is not adjacent to the refinery, as the Siding(s) 172-173 ***connects between the mainline and the SMR spurs.***

The turnout ***[=siding]*** guides north- and southbound trains off the mainline onto the refinery’s rail spur.

Trains going south can move directly onto the Refinery rail spur.

Trains coming north must pass the refinery spur and then back onto the refinery spur.

2-11/7 Because other trains continually pass through the Arroyo Grande/Santa Maria area on the Union Pacific mainline, the turnout must allow a unit train to clear the mainline without stopping.

Via the Siding

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-38

Angeles Chapter
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Submitted Via E-Mail: p66-railspur-comments@co.slo.ca.us

Jan. 27, 2014

TO: Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408-2040
ATTN: Murry Wilson, Environmental Resource Specialist

SUBJECT: PHILLIPS 66 COMPANY RAIL SPUR EXTENSION DEIR, (SPUR DEIR)
SLOCo. File DRC2012-00095
RE: Public Comments on Adequacy, Completeness, and Objectivity of DEIR

DETAILED COMMENTS PART 4

Page Number/Paragraph Number and Text

SC-AC/FOG Committee Comments

2-11/7 The existing refinery spur rails would be replaced as part of the project.

Existing spur rails may be relocated from existing coke loading facilities to a replacement Coke Loading location, northerly of the Rail Spur. No clear description of the coking facilities and replacement components are provided.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-39

2-12/F.2-6 and 2-13/F.2-7

Oily Water to Tanks rather than to Refinery Sump/Oily Water Treatment System

2-14/3 The unloading facility would be designed around "train slots" (a track that can contain an entire unit train).

Previous statements regarding the "train slots"...unit train" also mentioned manifest trains. The Project Description and assessment do not explain the process for manifest trains, only unit trains.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

SIER-40

Phillips 66 would unload up to five trains per week.

...estimates that a complete 80-car train would be unloaded within 10 to 12 hours, including time for positioning and preparing the train for departure.

...(Track 1 and Track 2) would allow adequate capacity unloading.

Unloading a unit train in 12 hours with two unloading would result in a maximum throughput of 80 x 2 x 2 = 320 tankers per day and with 600 bbl/tank car = 192,000 bbl/day compared to a maximum 48,000 bbl/day throughput of SMR. Proposed verbal limitation to five trains per week is not supported by any physical limitations.

Based on such throughput calculations, a suitable alternative would reduce loading facilities by four-fold (192,000 bpd /4 = 48,000bpd).

Other Phillips66 refineries and unloading facilities have stated that they can operate 100-car unit trains, while the Project assumes only 80 cars without basis of development and its relationships to the Rail Spur, the UPRR-siding, and Mainline.

SIER-41

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR SIER-41

2.3.10 Spill Containment and Response Facilities

Drain boxes would feed below-grade 16-inch-diameter drain lines routed to three parallel 20,000 gallon rectangular storage tanks (approximately 60,000 gallons total volume) located in a vault for containment. Two pumps would transfer any contained oil/water through a new pipeline into the existing refinery's oily water system.

The system would be sized to contain the contents of one rail car as well as the foam and water that would be released from the fire suppression system. The spill containment system is shown in Figure 2-7.

Drawings and other listings do not show the fixed pumping facilities for the containment element and how the connection of these elements will be integrated with other SMR spill containment facilities and operations SIER-42

Unless documented through an approved spill prevention plan, use of a single-tank car for sizing the containment tanks with/without pumps operating when a total of 20 tank cars would be on site and being pumped. Therefore the single tank cannot be justified unless other separation are included in the Project.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

2-18/2 The refinery is also covered by the California Accidental Release Prevention (CalARP) program, which is designed to prevent accidental releases potentially harming the public and the environment and to satisfy community right-to-know laws. Phillips 66 has prepared the required Risk Management Plan (RMP) to analyze the potential for accidents and development of operating procedures, training and maintenance requirements, compliance audits and incident investigation. The refinery additionally has an approved Spill Prevention, Control and Countermeasure Plan (SPCC).

No documents are provided or made accessible to confirm and/or assessment the adequacy and completeness. Therefore program/RMP/SPCC plan and impacts arising from a totally new components cannot be evaluated, but must be assumed to be incomplete and inadequate to deal with the unique impacts of a Rail Spur unloading facility. SIER-43

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

2-21/2 **2.5 Operations** Project operations would include unloading of up to five trains per week, with an annual maximum number of trains expected to be approximately 250.

The feedstock will be sourced from oilfields throughout North America based on market economics and other factors.

These could include fields as far away as the Bakken field in North Dakota or Canada. SIER-44

As indicated elsewhere these statements are not supported by the DEIR nor are they fully disclosing, complete, and adequate.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

2-21/3 In a unit train...consist of three locomotives, two buffer cars, and 80 railcars carrying 23,500 gallons each or 73 railcars carrying 30,000 gallons each depending on the car size, for a total of approximately 1,880,000 (44,762 bbls) or 2,190,000 gallons (52,142 bbls) of crude oil.

As indicated elsewhere, Phillips66 has other Pacific Coast facilities using 100-tank car unit trains rather than 80-car units. SIER-45

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

2-21/4 An additional two locomotives would be required for the portion of the route between Santa Margarita, California and San Luis Obispo, California coming over the Cuesta grade (a distance of approximately 15 miles). A dedicated locomotive would remain on-site to move cars. SIER-46

No description is provided as to the capabilities of the "dedicated locomotive" (=switching or yard engine) and the needs when assuming 3-9 mainline engines may be onsite, on the sidings, or even on the Coking Spurs.
The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-46

22/4 The rail spur has been designed to allow for unit trains to arrive at the refinery from the north or the south on Union Pacific's main line track. However, it is expected that the train would normally arrive heading south on the Union Pacific mainline track.
The trains would enter the existing refinery spur from the north after having pulled off onto the Union Pacific siding track.
The Rail Spur does not directly connect to the mainline, only to the Sidings.
There is no "existing refinery spur" only the Coke Loading Spur which shall be removed and relocated.
The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-47

2-23/4 4. ***Idle Time Prior to Departure –*** Once the unloading operations are complete...the empty car train located on Track 5...idle time would depend upon how long the train had to wait until the Union Pacific scheduled departure. Based upon an 11.5 hour turnaround, it would be about one-hour and forty-minutes.
2-23/6 Table 2.5...estimated times associated with each operation listed above. The total time...approximately 10 to 12 hours, of which about eight [8] hours would be needed for unloading, switching and repositioning activities.
As indicated elsewhere, these statements indicate that the 80-car unit trains can be unloaded in 12 hours. It is not clearly stated as to whether trains on each track-set on two sides of the unloading system can be unloaded in 12 hours. With 10 unloading systems/stations, 10 hours, and 80 cars on each side, the maximum unloading capacities may be 8 cars/hour with 0.8 cars/station/hr and 500 bphr at a station. Without adequate parameters and rates, the proposed unloading facility may have a 100K-200K bbl/day capacity compared to the refineries capacity of less than 50,000 bbl/day.
The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-48

2-26/2 **2.5.2 Refinery Operations**
The crude oil delivered by rail and pumped to the storage tanks at the refinery would be processed at the SMR and then transported by pipeline to the Rodeo refinery in the Bay Area.
No crude oil or refined product would be transported out of the refinery by rail.
SMR operations could change based on the availability of lighter crude oils from more distant fields (such as the Bakken Field), causing less production of coke and sulfur at the refinery.
The Refinery is required in order to lighten the heavy crude oils before pumping. No SMR processing would be required if a light low sulfur crude as the crude could be immediately transferred to outgoing pipeline(s) without passing through the SMR processing facility.
The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-49

2-26/2 However, refinery operations stemming from delivery of crude by rail most likely would not increase the coke or sulfur production as heavier crude oils than historical Refinery feedstock would most likely not be transported to the new rail facility.
2-26/2 The implementation of the Rail Project would not increase the refinery throughput.
2-29/1 Gas oil and naphtha are shipped by pipeline to the San Francisco-area Rodeo Refinery for processing into gasoline, diesel fuel, and other petroleum end-use products.
2-30/4 This declining production coupled with the lack of ability of the refinery to source competitively priced crude oil from outside the local area generates the need for the Rail Spur Project. The need for the project is not related to the permitted capacity of the refinery.

SIER-50

2-30/5 Crude oil received by rail and pipeline could not exceed the capacity limits established by San Luis Obispo County Department of Building and Planning and the APCD. These throughput limits cannot be exceeded without a modification to the permits, which would require additional environmental review.

Once this DEIR is certified and used by the APCD for review and consideration of their PTC and PTO, then crude oil delivered by rail would be limited to those parameters of the maximum capacities of the physical facilities approved through this current regulatory and CEQa process. As indicated elsewhere, the maximum capacities may range from >50,000, to 100,000, and upto 200,000 bbl per day throughput. Without details for the permit to operate, the statements can be opened to wide ranges of interpretations.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-50

2-30/6 Depending upon the volume of crude oil received by rail, some of the oil delivered via pipeline or via truck to the Santa Maria Pump Station could be displaced. Any displaced crude oil would likely be sold to other refineries in the Los Angeles or Bay areas. The amount, location, and destination of any displaced oil would be driven by market forces. Given the dynamics of the crude oil market, it is speculative as to what if any local crude oil would be displaced, and what would happen to any oil if it were displaced.

The DEIR includes too many "depending", "likely", "driven by market conditions", "dynamics of...market", etc. and the applicant, agencies, and preparers have not provided a full disclosure, complete, and adequate project description, assessment of effects, alternatives, and mitigations.

The applicant appears to want and agencies and preparers appear to support a blank check to do anything they want for the crude logistics in central California and corridors to their producers in the central "North American" fields.

The Rail Spur DEIR must be thoroughly revised and provide a full disclosure complete, and adequate DEIR with a thoroughly documented system's analysis from the entry of trains, unloading, processing/storage at SMR, and transport via any pipelines between the SMR and RdR.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-51

Refinery Upgrade DEIR 2011 2-19/1,2,3 **2.1.7.1 Pump Stations**

The ConocoPhillips pipeline utilizes multiple pump stations along the pipeline route from the SMF to the Rodeo SMF...located within San Luis Obispo County are Santa Margarita, Shandon, Creston, Summit, and Cuesta pump stations (see Figure 2-10). The Santa Margarita and Shandon pump stations each consist of pumps driven by natural gas combustion engines and related storage tanks. The Summit and Cuesta pump stations consist of only storage tanks. The Creston Pump Station is currently inactive.

The pipeline routes are inconsistent and conflicting between SMR and RdR and thereby the setting and project description are incomplete and inadequate.

No specific capacities or identifications bottleneck facilities has been provided, and no documented assessment has been provided for air emissions at their maximum capacities.

Santa Margarita Pump Station, Shandon Pump Station, and Cuesta Pump Station

Although some specifics are provided, no specification for capacities - flows, pressures, and head-losses is provided to evaluate impacts beyond the Project.

Creston Pump Station There are no longer any pumps or active tanks...

No facilities are described although the station is located and could be re-developed for logistic services but nothing has been provided to evaluate impacts beyond the Project. Inclusion in this DEIR allows future CEQA compliance without details at this stage.

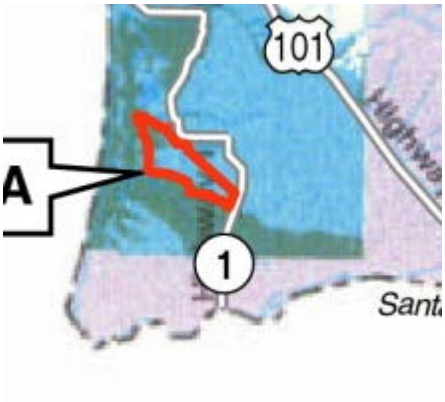
No discussion and assessment for pipelines and induced impacts outside of the strict limits of the Project area or even the SMR has been provided in conjunction with existing sites and facilities along existing pipeline routes.

The DEIR was incomplete and inadequate by not providing a thorough analyses of outgoing crude logistic/pipelines and potential for related projects in order to match capacities and debottlenecking, including the proposed Project..

The DEIR for the refinery expansion must be included and revised and updated through the DEIR for the Rail Spur and provide a consistent description of all facilities and settings and current DEIR recirculated.

SIER-52

p.4.6-7 **Figure 4.6-4 Liquefaction Hazards**



SIER-53

Although liquefaction is important the above figure was not adequately presented in the DEIR and clearly was included without specific application to the Project, when enlarged the details of the Figure show that the proposed Project and rail sidings and spurs may be subject to risks of liquefaction and require thorough mitigation to avoid significant impacts and spillage. Later on in Sec. 4.6, general "mitigation measures" are simply required compliance with regulations for future studies to justify the lack of significant impacts. Such appeals to future studies avoids complete and adequate assessment of impacts and additional mitigation required to deal with the specifics of the Project and to provide public access to information to make comments and decisions regarding adequacy and completeness of the DEIR and FEIR.

A site specific geotechnical study is required and must be integrated along with the assessment of contamination of the site and groundwater by the Coking facilities.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

4.6-8/2 The proximity of the site to the Oso Flaco Creek floodplain to the south indicates that high groundwater levels may be seasonally high or under other high water table conditions. In 1990, borings drilled at the refinery indicated that shallow groundwater was locally present at an elevation of 56 to 58 feet above mean sea level, corresponding to a depth of approximately 20 to 25 feet, at the lowest topographic areas of the proposed rail spur portion of the Project Site. Borings drilled from higher elevations within the refinery, up to 60 feet higher than portions of the proposed rail spur portion of the Project Site, did not encounter groundwater to a depth of 61 feet (Dames & Moore 1990). Borings subsequently drilled in 2008 at the refinery did not encounter groundwater to a maximum depth of 31 feet, although these borings were also drilled at elevations up to 60 feet higher than the lower portions of the proposed rail spur portion of the Project Site (Earth Systems Pacific 2008a, 2008b).

SIER-54

No reference is made to the groundwater contamination from the Coke Loading Spur facilities and areas and the groundwater studies conducted for that issue.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

4.6-8/3 The Project Site is underlain by relatively uniform sand. However, <u>in general</u>, the sands are sufficiently dense to prevent liquefaction at levels of seismically induced ground motion corresponding to the ULE earthquake (Dames & Moore 1990).

No information is directly accessible to the public in order to review the supporting technical documents and the claims herein.

SIER-55

As the preparer is not a registered geologist or geotechnical engineer, no such interpretation can be accepted and without quotations attributed to the Dames and Moore study cannot be verified.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

Angeles Chapter
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Submitted Via E-Mail: p66-railspur-comments@co.slo.ca.us

Jan. 27, 2014

TO: Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408-2040
ATTN: Murry Wilson, Environmental Resource Specialist

SUBJECT: PHILLIPS 66 COMPANY RAIL SPUR EXTENSION DEIR, (SPUR DEIR)
SLOCo. File DRC2012-00095
RE: Public Comments on Adequacy, Completeness, and Objectivity of DEIR

DETAILED COMMENTS PART 5

Page Number/Paragraph Number and Text

SC-AC/FOG Committee Comments

4.6-8/4 **4.6.1.5 Mineral Resources**
The California Geological Survey (CGS), previously known as the California Division of Mines and Geology, has classified land in San Luis Obispo County according to the presence or absence of significant Portland cement concrete-grade aggregate deposits.
Mineral Resources must include oil and gas resources and the reference to the underlying geology which would be expected to contain such. Furthermore, the subsurface ownership must be provided as it is related to the mineral resources and their access.
The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-56

4.6-10/3-4 **4.6.2.4 California Division of Oil, Gas, and Geothermal Resources**
The California Division of Oil, Gas, and Geothermal Resources regulates environmentally sensitive pipelines, which are defined under California Code of Regulations Section 1760 as:...pipelines...
4.6-10/4 Any pipeline for which the Supervisor determines there may be a significant potential threat to life, health, property, or natural resources, in the event of a leak, or that has a history of chronic leaks.
4.6-10/ California Code of Regulations, Title 14, Section 1774 requires a pipeline management plan for environmentally sensitive pipelines.
No documents regarding Spill Contingency Plan or the Pipeline Plan is providedd.
The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-57

4.6-11/5 The following significance criteria for geological resources were derived from the San Luis Obispo County Environmental Checklist which was developed in accordance with Appendix G of the CEQA Guidelines. Impacts of the proposed Project would be considered significant and would require mitigation if the Project:
• Results in exposure to or production of unstable earth conditions, such as...liquefaction, ground failure, land subsidence, or other similar hazards;
• Results in...unstable soil conditions from Project-related improvements, such as vegetation removal, grading, excavation, or fill;
• Is inconsistent with the goals and policies of the County's Safety Element relating to geologic and seismic hazards; or

SIER-58

4.6-12/4 Shallow groundwater and sandy soils also create a moderate potential for liquefaction at the Project Site.
Water levels measured in borings drilled at the Project Site, in combination with the proximity of the site to the Oso Flaco Creek floodplain to the south, indicates that high groundwater levels may be seasonally high or under other high water table conditions.
Lateral spreading and seismically induced settlement typically occur in association with liquefaction. Because of the nature of the industrial activities proposed, the effects of seismically induced ground failure could be severe and include hazardous oil spills, risk of fire, and soil, surface water, and groundwater contamination.
4.6-12/6, 13 - 14 **Mitigation Measures** The following measures would ensure that the Rail Spur Project is consistent with goals and policies of the County's Safety Element relating to geologic and seismic hazards:

SIER-58

As indicated above, the entire issue of liquefaction has been avoided and no current geotechnical study has been done for the Project. A single map figure clearly indicates that liquefaction may be an issue but without any publically accessible information the setting is totally inadequate and incomplete. Therefore the setting must be assumed to inadequate other than 20 year old references and any impact assessments must be considered to establish significant impact which require proper assessment by qualified geotechnical specialists. Ascribing future studies and probable compliance with regulations do not represent full disclosure, adequacy, or completeness of assessments.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

4.6-18 **4.6.6 Mitigation Monitoring Plan** 4.6-20 GR-1h
The Applicant shall cease rail car unloading and pipeline oil conveyance following any perceptible (i.e., felt by humans) seismic event and inspect all project-related facilities, equipment, and pipelines for damage prior to restarting operations.
Cease any rail car unloading and pipeline oil conveyance and inspect all project-related facilities, equipment and pipelines following any perceptible seismic event.
Inspection for earthquake damage of unloading and oil conveyance infrastructure immediately following seismic events. County Planning and Building would be responsible for compliance.

SIER-59

Seismic responses and potentials for liquefactions appear to be issues for the Project and are closely related to issues of spillage and containment for the entire Rail Spur project. The DEIR does not present the existing relevant sections of spill plans required now, nor drafts for the future facilities and operations of the Project and associated sections of the current Refinery and pipelines.

As no information has been provided for review and evaluation for comments, the DEIR must be found to be incomplete and inadequate and perhaps lacking in objectivity.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

4.7 Hazards are only analyzed north of project rather than both north and south along the UPRR and oil pipelines in central San Luis Obispo County.

SIER-60

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

4.7-1/1 **4.7 Hazards and Hazardous Materials**
This section discusses <u>potential public safety</u> and hazardous materials impacts...potential risk scenarios and their significance, and the levels of risk to the public or <u>environment</u> associated with these scenarios.
4.7-1/3 In general, oil and gas refinery facilities present hazards to <u>employees and the public</u>
4.7-1/5 For the <u>public safety</u> analysis...rail corridors in the County associated with the Rail Spur Project, the existing...pipelines, alternatives, and the areas in the immediate vicinity of the Rail Spur Project that could be affected by an upset at the unloading facilities. The area that could be impacted by a release also includes all rail routes in the County and any routes associated with <u>existing trucking</u> of crude oil or associated facility hazardous materials.

SIER-61

4.7-2/1 The study area that would be affected in terms of <u>public safety</u> by an upset condition includes:

Here the DEIR limits hazards and hazardous materials impact to those public safety and does not extend to environmental safety in keeping with the past contamination of the Coke Loading site.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR

SIER-61

4.7-2/6 In addition to API gravity, crude oils are also characterized by Reid vapor pressure. Reid vapor pressure (ASTM Method D 323) is the absolute vapor pressure exerted by a liquid at 100 degrees Fahrenheit (°F). The higher the Reid vapor pressure, the more volatile the oil and the more readily it will evaporate.

Although the RVP and TVP are very important to air quality/emissions and vapor cloud formation and combustion, this is the only use or reference to RVP/TVP in the DEIR and is indicative of the inadequacy and incompleteness of the document.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

SIER-62

4.7-2 - -25/1 ***Nothing specific to the site or the Project is provided in the main text and references, i.e., it is boiler-plate copied from another document.***

The entire Project Description and assessment require Project specific detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

SIER-63

4.7-2 The UPRR traverses San Luis Obispo County in a north-south direction and passes through the main urban areas of the county (see Figure 4.7-2). For the risk analysis, the rail route was divided into 41 different segments based on population density using the categories listed in Table 4.7.6.

The figure and table and analyses only deals with the northern portion of the UPRR mainline and does not consider at all the southern approach to the Project which is clearly stated in the Project Description must be considered for crudes coming from Texas (e.g., Permian Basin).

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

SIER-64

4.7-32/4 Spill volumes are calculated based on the pipeline elevation profiles and previous environmental impact reports prepared for the pipeline (SBC 2001). Spill volumes could be as high as approximately 8,400 barrels between the Santa Maria Pump Station and the Summit Pump Station. The most sensitive area would be the Santa Maria River crossing and the Nipomo Creek corridor.

As indicated elsewhere, the pipeline corridors are not delineated consistently and provided with pumping capacities, valve closure timings, locations of motorized valves, and pump stations, all of which are vital to spill volume estimates. Since such are required in proper pipeline Spill Contingency Plans, their absence herein must indicate a total incompleteness on the part of the DEIR. No calculations are provided and no specific references to 8400 barrel estimate has been provided and without pipe diameters, profiles, and throughput nothing can be evaluated or commented on due to the inadequacy and incompleteness of the DEIR and supporting documents.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

SIER-65

4.7-32/5 Refinery to Rodeo Pipeline Spills associated with the Refinery to Rodeo pipeline would be a function of the pipeline size, flow rates, and the pipeline elevation profile.

This is true but nothing is provided. No calculations are provided and no specific references to 8400 barrel estimate has been provided and without pipe diameters, profiles, and throughput nothing can be evaluated or commented on due to the inadequacy and incompleteness of the DEIR and supporting documents.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

SIER-66

4.7-39/3 The Environmental Protection Agency has identified the Refinery as a “corrective action” site due to contamination. According to EPA Resource Conservation and Recovery Act reports, the site has human exposure “under control,” but migration of contaminated groundwater is “not under control” (US EPA 2011b). Contacts with the RWQCB indicate that:
1) There has been regular groundwater monitoring at the site with the latest data from February, 2011;
2) Reports indicate low levels of TPH and metals;
3) The contaminated groundwater is associated with the coke piles;
4) DTSC is the lead agency on the coke pile clean up; and
5) RWQCB is the lead agency on the groundwater contamination (CSWRCB 2011).

SIER-67

Such documents referenced are not widely available and accessible to the public, and nothing can be evaluated or commented on due to the inadequacy and incompleteness of the DEIR and supporting documents.

It should be noted that the Geology section did not refer to the groundwater contamination and geotechnical and geological information that may have been available through the Water Board.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

4.7-45/2 **National Contingency Plan Requirements**

Spill Prevention Control and Countermeasures Plans, 40 CFR 112.3 and 112.7

Facilities that store large volumes of hazardous materials are required to have a Spill Prevention Control and Countermeasures Plans (SPCCP) per the requirements of 40 CFR 112 submitted to the EPA. The SPCCP is designed to prevent spills from onsite facilities and includes requirements for secondary containment, provides emergency response procedures, and establishes training requirements.

SIER-68

None was provided or made accessible specific to the Project or SMR or the pipelines.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

5-1/1 5. Alternatives

5-10/5 **5.1.4.1 Reduced Rail Deliveries**

With this alternative the number of train deliveries to the SMR would be limited to a maximum of three per week (the Rail Spur Project is a maximum of five trains per week), with an annual total of 150 trains.

5-10/6 All other aspects of this alternative would be the same as the Rail Spur Project. The reader is referred to Chapter 2, Project Description, for a detailed description of the construction and operations of the rail spur.

5.13/7 5.2.6 Reduced Rail Deliveries

This alternative would be identical to the Rail Spur Project except that it would only have three trains per week delivered to the SMR versus five. For all the issue areas other than air quality and hazards the impacts would be the same as the proposed project. This alternative would reduce the annual air emissions from the project, but the peak day emissions would remain the same. The air emissions from the Rail Spur Project were found to be less than significant with...5-14/1...mitigation. However, the County may be preempted by Federal law from applying mitigation to the UPRR mainline emissions. In this case, the UPRR mainline emissions would be significant and unavoidable. Reducing the train deliveries to three per week would eliminate the significant and unavoidable air impact associated with the annual emissions. However, the peak day emissions would still remain significant and unavoidable.

SIER-69

5-14/2 The hazard impacts associated with train accidents would be reduce since fewer trains would be delivered to the SMR. However, this was found to be a less than significant impact for the Rail Spur Project. The oil spill impacts associated with biology and water resources would remain the same since the spill volumes from a rail tanker car would remain the same.

5-14/3 If the County is preempted from applying mitigation to the UPRR mainline air emissions, then this alternative would serve to reduce the severity of the significant and unavoidable air quality impact. Therefore, this alternative has been selected for further evaluation in the EIR.

5-28/8 **5.3.3 Reduced Rail Deliveries**

This alternative would be exactly the same as the Rail Spur Project in terms of construction and operation with the exception that only three trains per week would be delivered to the SMR instead of the proposed five per week.

All of the impacts and mitigation measures identified for the Rail Spur Project in these issue areas would also apply to this alternative. The reader is referred to Chapter 4 of the EIR for a description of the impacts and mitigation measures for each of the issue areas listed above.

Issue areas where the impacts would be different than the Rail Spur Project are discussed below.

As indicated elsewhere, this alternative is staged in such a manner as to non-objectively distort its comparison to the proposed Project. The total project site and many facilities could be reduced so that the maximum capacity of the Project would be sufficient to meet current refinery capacities.

SIER-69

As shown here, the preparers have placed different information and assessments in different places in the document which confuses the public purposefully in order to avoid reasonable review and comments.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

5-12/7 **5.2.3 Marine Transportation**

The information in Table 5.1 shows that this alternative would result in an increase in the severity of the majority of the impacts identified for the Rail Spur Project. While it would reduce or eliminate some of the onshore impacts, these would be more than offset by the introduction of a large number of marine related impacts that would not exist for the Rail Spur Project. A number of the marine oil spill related impacts would be significant and unavoidable (i.e., marine biology, marine water quality, recreation, etc.).

5-12/8 This alternative would not meet most of the objectives of the project, and in particular it would not allow access to North American crudes. The marine alternative would only be capable of providing foreign or Alaskan crudes to the SMR.

SIER-70

Numerous offshore facilities which have had maritime collection of crude oil could also deliver or collect crude oils to pipelines that are connected into the central California pipeline network

Phillips66 Ferndale facilities are capable of shipping out the same crudes as those delivered to the Project by rail to various maritime terminals in central California and delivered to the SMR by existing pipelines.

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

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Submitted Via E-Mail: p66-railspur-comments@co.slo.ca.us

Jan. 27, 2014

TO: Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408-2040
ATTN: Murry Wilson, Environmental Resource Specialist

SUBJECT: PHILLIPS 66 COMPANY RAIL SPUR EXTENSION DEIR, (SPUR DEIR)
SLOCo. File DRC2012-00095
RE: Public Comments on Adequacy, Completeness, and Objectivity of DEIR

DETAILED COMMENTS PART 6

Page Number/Paragraph Number and Text

SC-AC/FOG Committee Comments

7-16/4 **Geological Resources, Section 4.6**

Mitigation is required for any significant impacts, but the inclusion of government regulations and application requirements, e.g., a geotechnical study, and competent geotechnical and engineering reviews and studies, and designs clearly shows the lack of substance in the Project Description and the setting of the Project and the total inadequacy of the assessment of geological and many other sectors and their impacts and mitigation..

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

SIER-71

8-1/1 8.0 Mitigation Monitoring Plan

The Chapter provides the mitigation monitoring plan...provide some general information on the requirements for a mitigation monitoring plan and the authority and enforcement responsibility.
The last part of the Chapter provides the detailed mitigation monitoring plan for the Rail Spur Project.

Mitigation is required for any significant impacts, but the inclusion of government regulations and application requirements and future studies clearly shows the lack of substance in the Project Description and the setting of the Project and the total inadequacy of the assessment of geological and many other sectors and their impacts and mitigation..

The entire Project Description and assessment require detailed review, revision, and recirculation along with dependent sections of the DEIR. We request the revision and recirculation of the DEIR.

SIER-72

PHILLIPS66 BACKGROUND

October 31, 2012: California Refineries are in Lower Performing Part of Refinery Portfolio and Must Improve. ***Greg*** Garland...Phillips 66 was looking at getting railcars capable of hauling even cheaper Canadian heavy crude ***[=Dilbit]*** to the company's refineries in California. However, he said resistance to such a move was likely. A 2006 California law requiring sharp cuts in emissions has a component that would require refineries to run crudes produced in environmentally friendly ways. Canadian crude production comes with high emissions.

February 5, 2013: Tim Taylor Tells Credit Suisse Energy Summit That Canadian Crude is Being Transported to California Refineries. Phillips...moving cut-price Canadian crude ***[=Dilbit]*** to its California refineries at Los Angeles and San Francisco via rail. "...deliver Canadian crude to our California refineries by rail,"...***Greg*** Garland told Reuters 013013 that Phillips was looking at coiled tube cars that are suited to bitumen in Canada's heavy oil deposits...

April 3, 2013: Phillips Plans Rail-Unloading Facility for Ferndale Refinery Fox Business. Phillips plans to build a crude-oil unloading facility that would allow a train with 100 or more railcars to pull up at the refinery and have its cargo pumped to existing storage tanks...to transfer about 12,800 barrels ***[=300+K bpd]*** of oil per hour, allowing a new train to be unloaded about every other day...considering a rail rack at the Ferndale refinery...allow...Canadian crude that could then be sent by ship to refineries in California.

May 1, 2013: Phillips Increases Share of Advantaged Crude to 68%. Fox News 050113 that Phillips...to increase its use of relatively cheap crude by building rail capacity at its plants and buying rail cars to help bring crude from shale formations not yet reached by pipelines and the company has been inching toward the goal of processing only discounted crudes ***[=dilbit]*** extracted in North America...

PIPELINE BACKGROUND for Comments

Sept. 2008 ConocoPhillips Santa Maria Refinery Throughput Increase Project, Notice of Preparation
p.13/Figure 1 Santa Maria and Rodeo Refinery Locations

The pipeline, which runs from Junction Station near Lost Hills, California, to the 128,000-barrel-a-day Rodeo plant, was struck by a third party yesterday, Romelia Hinojosa, a spokeswoman for the Houston-based company, said in an e-mail.
PHILLIPS 66 PIPELINE LLC; 256 E. POLK STREET COALINGA, CA 93210
LOCATION: JUNCTION PUMP STATION 14990 HWY 46 LOST HILLS. CA 93249