RECEIVED
NOV 2 1 2
SLO CO PLAN & BLDG DEPT

William L. Schneiderman, M.D.
1915 Northwood Road
Nipomo, CA 93444
(805) 343-3016
email: billobgyn@aol.com

November, 19, 2014

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

Dear Mr. Wilson:

My name is William Schneiderman, I am 70 years old, and my wife and I moved from Silicon Valley to Trilogy in Nipomo in 2006. I was in pretty good shape.

The last year or so, I had trouble walking even short distances, getting winded very quickly and went for a physical about 4-5 months ago. At that time, they said that I had mild COPD, and with no past history of a respiratory problem they said that it possibly be caused by the air that I was breathing. SCW-01

1. The new proposed Phillips 66 Rail Spur will increase the air quality impacts from two Class I impacts to at least 5 Class I impacts. SCW-02

2. The arrival of Tar Sands in SLO County: The Tar sands has a substantially higher concentration of sulfur, copper, nickel, nitrogen, lead and benzene than are found in conventional crude. SCW-03

3. Higher Levels of Sulfur Dioxide: The main danger is that facilities that refine tar sands could emit significantly higher amounts of sulfur dioxide. That could lead to chest tightness, asthma, reduced lung function, respiratory weakness and cardiovascular issues as well as cancer. Sulfur dioxide is especially dangerous for people who have preexisting heart and lung conditions. SCW-04

4. Increased Quantities of Petroleum Coke: The refining of the tar sands also yields a much higher amount of petroleum coke, also known as "petcoke." This is left onsite, in widespread open hills of black granules and dust that can easily be blown inland and breathed in by residents. "Petcoke" is linked to potential increases in heart attacks and respiratory issues. SCW-05

The Transporting of the Crude Oil down the Cuesta Grade of five trains each with 80 fully-loaded tankers each week is a frightening thought for SLO County. Are we prepared or can we ever be prepared for an accident involving an accident of this train on the Cuesta Grade or for that matter anywhere else in SLO County? SCW-06

Finally, I am a retired OB-GYN who was in pretty good shape when he moved to Trilogy and after 8 years has developed COPD. What does the future hold for the lungs of newborns, children and young adults and their developing lungs? SCW-07

Very truly yours,

William L. Schneiderman, M.D.

Responses to William L. Schneiderman Comments

SCW-01	This comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. No further response is required.
SCW-02	The original EIR addressed only emissions within SLO County. The revised EIR broke this Class I impact into two parts, emissions within SLO County (both onsite and offsite) and emissions along the mainline outside of SLO County to Roseville or Colton. The criteria for impacts related to health risk were also revised based on the fact that the state agency, OEHHA, is revising their criteria for health risks and this impact was also divided into SMR site and mainline. The GHG scope was revised to address GHG emissions along the entire route as well (to Roseville or Colton), thereby increasing GHG emissions. In combination with the preemption issue, these changes produced additional Class I impacts. Note also that some revisions to rail car handling onsite also changed the onsite emissions levels somewhat. Note that the emissions and modeling related to health risks did not change for the revised EIR, only the criteria for determining cancer impacts were revised based on revisions that were being finalized by OEHHA (although the most recent OEHHA model was used for the Final EIR. The HARP2 model was released by OEHHA after the RDEIR was released). Chronic and acute impacts did not change, but were updated in the FEIR based upon the new HARP2 model. See Appendix B.2.GHG emissions within SLO County are the same as the original draft, but GHG emissions along the mainline outside of SLOC have been included.
SCW-03	The increased levels of nickel, vanadium, lead and copper do not affect air emissions as none of the crude oil is combusted and none of the metals are carried over in the fuel gas. The metals would remain in the coke. Sulfur production would increase producing potentially more sulfur trucks trips, as discussed in Section 4.3.4.2 (see Section 4.3 Air Quality and Greenhouse Gases). The RDEIR examined changes in emissions associated with a change of slate as part of Impact AQ.2 (see Section 4.3, Air Quality and Greenhouse Gases). For the SMR, key crude slate parameters that could impact air emissions include the percent of BTEX, vacuum resid, sulfur and metals in the crude oil. The BTEX was analyzed in the health risk assessment to determine the increased health risk. Increased sulfur was assessed as to the increased sulfur truck trips that would be required. None of the other components would alter the emissions at the refinery as the heavy metals would not be emitted into the air from the SMR. Note that as the API gravity would be similar, the emissions of volatile components (ROG) from fugitive emissions would be similar with the change in crude slate. BTEX levels of Canadian tar sands crude oil are similar to other heavy crude oil processed by the SMR and the EIR demonstrates that any increases in

	BTEX would generate a nominal increase in health risk. The potential increase in BTEX has been addressed in the EIR. See Impacts AQ.2 and AQ.4 in Section 4.3, Air Quality and Greenhouse Gas Emissions. However, during the Enbridge Spill, 1,086 air samples of benzene levels, for example, were measured and 21 of the samples showed air concentrations above the EPA action levels (http://www.epa.gov/enbridgespill/data/dataair.html) of 6 ppb, indicating that some volatiles were present in the spilled materials although not very much. Sampling conducted by the Michigan Department Of Natural Resources And Environment Environmental Laboratory on the crude oil in the Enbridge pipeline (which was dilbit from Canada, same as would be expected for the proposed project) indicated that benzene could be as high as 1,100 ppm in the crude, Xylene as high as 1,200 ppm and Toluene as high as 1,900 ppm (measured as mg/kg) (http://www.epa.gov/enbridgespill/data/index.html#aqdata). The results indicated a BTEX concentration of about 0.50%, or, as per Table 4.3.13 in the RDEIR, within or below the range of crude oils currently processed by the SMR. The Keystone Pipeline FEIS (2013) also examined a wide range of crude oils and demonstrated that the " BTEX content of the dilbits [from Canada] is much lower than that of many lighter crude oils" The EIR analyzed a BTEX concentration of 1.25% to be conservative which indicated nominal increases in health risk. BTEX levels of the proposed project crude do not present a "far greater" amount of BTEX from fugitive components. In addition, fugitive emissions from components are estimated based on industry-wide average emission rates developed by the EPA and include a wide range of crude oil types, volatilities, BTEX fractions and compositions. The EIR demonstrated that changes to health risk due to a potential increase in BTEX to 1.25% are nominal and do not require further analysis. See Appendix B.2. The metals in the tar sands oil would not be volatilized at the SMR or along transportation routes and would therefore not contribute to increases in air-based health risk.
SCW-04	The use of higher sulfur crude oils would increase the amount of sulfur produced at the SMR. This increase in sulfur and the associated truck trips are addressed in the EIR in Section 4.3 (Air Quality and Greenhouse Gases). Emissions of sulfur dioxide are not anticipated to increase as most of the sulfur in the crude is removed as elemental sulfur and trucked from the site and the SLOCAPCD has limits on the emissions of sulfur dioxide from the refinery processing equipment.
SCW-05	The use of higher sulfur crude oils would increase the amount of sulfur produced at the SMR. This increase in sulfur and the associated truck trips are addressed in the EIR in Section 4.3 (Air Quality and Greenhouse Gases). As the SMR already processes heavy crude oils, and the tar sands crude oils would have a similar proportion of heavier materials, the production of coke is not

	expected to change with the project.
SCW-06	In San Luis Obispo County, the Cuesta Grade represents an area where a runaway train could occur. A runaway train coming down the Cuesta Grade could result in spills of crude oil and associated fires. The Rail Spur Project would use two additional locomotives (for a total of five locomotives) on the crude oil unit train for crossing the Cuesta Grade. These two additional locomotives would be added to the train at Santa Margarita and removed from the train in the City of San Luis Obispo once the train had crossed the Cuesta Grade. These additional locomotives would help to assure that the train can safely traverse the Cuesta Grade.
SCW-07	This comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. No further response is required.