From: cdsmelt <cdsmelt@earthlink.net>
To: "p66-railspur-comments@co.slo.ca.us"
<p66-railspur-comments@co.slo.ca.us>
Cc: mwilson@co.slo.ca.us
Date: 11/24/2014 01:53 AM
Subject: Phillips 66 Proposed Plan MUST be rejected

Mr. Murry Wilson, SLO County Planning Department:

While there are numerous reasons that the Board of Supervisors should NOT approve Phillips 66's proposed expansion plan, the number one reason is the substantial negative impact it would have on the health of all life due to toxic changes in air quality which the proposed P66 expansion would create.
With the arrival of some 520 trains per year come significant health problems to the entire county (and beyond) due to diesel exhaust alone.
Health officials have directly related heart disease, lung disease, and a number of types of cancer to diesel exhaust. The same is the case with petcoke, produced already at the refinery, guaranteed to increase in volume if the expansion is approved. With tar sands possibly (probably?) going to be refined at the refinery, there will be additional serious concentrations of toxic elements such as lead and benzene, among others, all known to affect respiratory and cardiac systems, often leading to cancer and death. SME-01
These toxic changes will affect not only humans, but all living things - animals, agriculture and the environment.

SLO County already has some significant air quality problems and is accumulating state and federal health standards violations. In fact, in its own REIR, Phillips 66 has identified five "significant and unavoidable"
Class I air quality damaging impacts.These problems are certain to increase and expand across the county, as well as adversely affect global climate changes, if this plan is approved. At what cost to all living things does Phillips 66 show concern in creating, and submitting, this proposal?
Rejection of the preposterous Phillip 66 proposed expansion plan is a must.
I urge the Board of Supervisors to disapprove this plan.

Sincerely,

Cheryl Smelt

Please, an unequivocal and resounding "NO" to outrageous Phillips 66 Company Rail Spur Extension Project Proposal

Responses to Cheryl Smelt Comments

SME-01	The RDEIR addresses the potential impacts and recommends mitigation measures for the proposed Project consistent with the requirements of CEQA. Section 4.3 (Air Quality and Greenhouse Gases) addresses GHG emissions, criteria air emissions and health risks. The EIR concludes that emissions of criteria, GHG and toxic pollutants would exceed the SLOCAPCD thresholds and would be a significant impact. 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. 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. The commenter's statement about air issues are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.