From: marciajohn@aol.com
To: p66-railspur-comments@co.slo.ca.us
Date: 11/25/2014 11:04 AM
Subject: Phillips 66 Proposed Rail Terminal

Dear Murry, SLO County Planning Department,

We recently moved to the Central Coast community of Trilogy Monarch Dunes. My first connection to the area came when my daughter attended and graduated from Cal Poly in the 1980's. We then had friends move here and we were once again struck by the wonderful lifestyle we could have here.
After visiting them for the past 6 years, we became convinced that this was the area we most wanted to live out our retirement years. We drive past the Phillips 66 plant quite often and only then do we realize it is even there. We never see and barely hear the activity of the facility.
Although, quite often, we are exposed to smells from the refinery from our home in Monarch Dunes. But it's not so bad that we would want to move, YET. TRJ-01

One of the things I am concerned about is the air quality and greenhouse gases. The smell of the deisel now at times makes several people nauseous.
I shutter to think what will we be faced with if this proposal is granted.
Their original EIR, recognized only 2 air quality impacts as Class 1. Yet in the REIR (A-4a Air Quality and Greenhouse Gases) recognizes 5 of them.
These are impacts that can't be mitigated to less than significant levels.
How did they come up with the additional ones in the months they had to revise it? What else are they hiding or using insufficient evidence or facts to plead their case for expansion? TRJ-02

A-4b Air Quality and Greenhouse Gases. If, as Phillips 66 says, there is a "good possibility" they will ship in "Tar Sands" crude oil from Alberta, Canada, the entire project will become unbearable for my community. This heavy crude has a substantially higher concentration of sulfur, copper, nickel, nitrogen, lead and benzene than are found in the conventional crude they are refining now. It goes up in the air and the wind from the West and North West will blow it straight across the Mesa and right over Trilogy Monarch Dunes and the surrounding communities, affecting thousands of people, none of them Phillips 66 decision makers. If they lived in this community, they wouldn't be proposing this expansion. TRJ-03

I believe that Phillips 66 has not been dealing in an honest way. Too many of the things they stated in their original EIR are proving to be misleading at best. I encourage you to not approve this expansion. TRJ-04

Thank you for your consideration,

John Traversaro

Responses to John Traversaro Comments

TRJ-01	These comments do not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. No further response is required.
TRJ-02	Odor associated with crude oil operations have been addressed in the RDEIR for the new components in place at the facility. Odors based on the emission levels from fugitive components was examined based on dispersion modeling and potential H2S levels. As fugitive component emissions are nominal, particularly related to refinery emissions, impacts were determined to be less than significant. Diesel emission impacts related to odors are primarily associated with close receptors. As a note, there are close to 40+ trains per week that travel the mainline and the project would add 5 trains per week. Current DPM impacts from these trains might cause health risk issues, but the levels at which DPM creates odors are far above those that produce health risk. Odors from current trains are not noticeable from area residences, even those located close to the track. This is also due to the buoyancy associated with the hot exhaust gasses, which cause the plume to rise instead of affecting ground-level receptors. Odors from DPM are not anticipated at receptors located a substantial distance from the rail spur and mainline locations. Diesel particulate matter odor and chronic impact levels are far above those that can cause cancer. The chronic REL from OEHHA is 5 ug/m3, and the EPA limits for mining exposure are 160 ug/m3. For cancer, however, 1 ug/m3 produces a cancer risk of 300 in a million. As per impact AQ.5 in Section 4.3 (Air Quality and Greenhouse Gases) of the EIR, cancer risks would generally be below 35 along the mainline routes, indicating that the DPM concentrations would be well below those that could cause chronic impacts. 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.
TRJ-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). 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.
TRJ-04	These comments do not identify a specific environmental analysis or CEQA

	issue relative to the EIR and compliance with CEQA. No further response is required. The EIR has been prepared by the County not Phillips 66.