



South Coast Air Quality Management District

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E-Mailed: April 3, 2014
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Mr. John F. Signo, AICP Senior Planner
City of Carson, Community Development Department, Planning Division
701 E. Carson Street
Carson, CA 9074

Review of a Draft Environmental Impact Report for the Shell Oil Products US Carson Revitalization Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document, especially the additional time made available for our review as a responsible agency. SCAQMD staff is concerned that the emissions estimates in the Draft EIR may not be consistent with emissions estimates required for permitting equipment associated with the proposed project/program. Differences between these emission estimates may affect significance determinations, which may require implementation of feasible mitigation. SCAQMD staff is also concerned about elements that appear to be missing from the project and cumulative analyses (e.g., heavy-duty diesel truck idling, transport refrigeration units, yard hostlers, rail alignment, site clean-up) and diesel truck mitigation. Details regarding these and other comments can be found in the attachment.

We appreciate your willingness to consider these comments and would appreciate a response as well as a copy of the Final EIR prior to the lead agency making any decision on this project. Should you have any questions, don't hesitate to contact James Koizumi at (909) 396-3234.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan".

Ian MacMillan
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

LAC140211-01
Control Number
IM:JK

Equipment Subject to Air Quality Permitting

SCAQMD engineering staff reviewed the City of Carson's Draft EIR for the proposed redevelopment of 448 acres on the Equilon Enterprises LLC (Id 800372) site. SCAQMD engineering staff focused on the new and modified equipment that would be subject to air quality permitting (no applications have been filed to date) and prepared the following preliminary comments. Engineering staff may have more comments once permit applications are filed.

- There are two thermal oxidizers at the facility that would be used to vent vapors generated from the loading of gasoline into tank trucks. An existing thermal oxidizer vents ethanol loading racks on what is proposed to become the west distribution facility. The EIR proposes to construct four additional loading lanes for gasoline service and to use this existing thermal oxidizer to vent these new loading lanes. A new thermal oxidizer or carbon adsorption unit is proposed to vent various chemical loading racks in what would become the east distribution facility. The EIR indicates that these existing chemical product loading racks will be used for gasoline loading.

Greenhouse gas (GHG) and toxic emissions were estimated using natural gas emission factors. The natural gas would be used as a start-up and supplemental fuel. However, the main fuel used in the thermal oxidizers would be waste gas (primarily gasoline, diesel fuel, ethanol and bio fuel vapors generated from tank truck loading operations). The emissions will be primarily from the combustion of these products and not natural gas; therefore, GHG and toxic emission factors associated with this waste gas should be used or developed to estimate GHG and toxic emissions from the thermal oxidizers. Engineering staff should be contacted at (909) 396-2684 to ensure appropriate emission factors are used.

- The EIR presents Equilon's plan to construct 30 additional external floating roof storage tanks. The calculation methodology used for determining storage tank emissions for SCAQMD permit applications is different than the methodology used in the Draft EIR. The permit application methodology is based on the Reid Vapor Pressure (RVP) value for gasoline, normally using a worst case value of RVP 15. The Draft EIR methodology used a MSDS-specific product blend and a corresponding True Vapor Pressure (TVP). The SCAQMD methodology estimates 13.61 pounds of VOC emissions per tank per day. The emissions from the same process in the Draft EIR are 10.07 lbs/day pounds of VOC emissions per tank per day. Thus, additional offsets may be required above and beyond those identified in the Draft EIR. Whatever calculation method is used in the EIR must be consistent with SCAQMD permitting requirements as we are a responsible agency for this portion of the project.
- The screening level Tier II health risk assessment used for air quality permitting indicates that the Maximum Individual Carcinogenic Risk (MICR) for the project would exceed 10 in a million for the nearest residential receptor (more than twice that amount). It appears that HARP was used to estimate health risks for the Draft EIR. SCAQMD staff was not able to thoroughly evaluate the HARP analysis because key files were not provided (e.g., HARP transaction files or HARP database). OEHHA has prepared a list of the HARP files that are required to allow a thorough review of health risk assessments by the public

<http://www.arb.ca.gov/toxics/harp/docs/datafilestable3.pdf>. These files should be provided with the Final EIR. The screening health risk assessment is more conservative than the detailed health risk assessment prepared for the Draft EIR. However, the health risks estimated by the SCAQMD staff only included permitted equipment (i.e., without mobile equipment). Since the combined construction and operational health risk reported in Draft EIR is close to significance threshold of 10 in one million (9.4 in one million for residential and 8.8 in one million for worker), it is unclear if changes to tank calculations, thermal oxidizer emissions based on waste gases or other changes indicated below may result in significant carcinogenic health risk impacts if not mitigated.

Consistency with the Applicable Air Quality Plan

The 2012 Air Quality Management Plan (AQMP) includes growth assumptions that were incorporated in the 2012 Regional Transportation Plan (RTP). These growth projections are largely based on each jurisdiction's General Plan. The Draft EIR discusses consistency with the AQMP by comparing the proposed project/program growth with the growth in the AQMP and compliance with existing SCAQMD rules. The Draft EIR also states that the proposed project/program is consistent with the Air Quality Element of the City of Carson's General Plan, in particular the redevelopment of underutilized areas. However it is not clear if this project is consistent with the growth projections in the city of Carson General Plan included in the 2012 RTP. In order to determine that the project is consistent with the AQMP, the Final EIR should clarify if the project is consistent with growth projections within the city's own General Plan. If the project includes more growth, then the Final EIR must demonstrate that the additional growth will not exceed total emissions projected for the city. Without this clarifying information, it is unclear to SCAQMD staff if the proposed project is consistent with the AQMP.

Heavy-Duty Diesel Truck Idling Emission Impacts

It appears that the air quality analysis in the Draft EIR did not specifically analyze onsite diesel truck idling related to the proposed project/program. Idling sites may include loading docks and areas where truck may queue. Because idling emissions are greater during idling, representing these areas in the health risk assessment is important to ensure that adverse air toxic impacts are correctly identified and mitigated if needed. Therefore, the health risk analysis in the Final EIR should include specific area where heavy-duty trucks may idle on a routine basis. SCAQMD staff recommends that a total of 15 minutes per truck visit be used to account for multiple onsite idling locations (e.g., entering the gates, at the dock, exiting the gates, etc.)

Transport Refrigeration Unit and/or Yard Hostlers

Analysis of transport refrigeration units (TRUs) and/or yard hostlers were not included in the air quality analysis. The project should address whether TRUs and/or yard hostlers may be used or restricted from use. If TRUs and/or yard hostlers may be used, then an estimate of emissions and impacts from these sources should be included in the Final EIR. Since regional NO_x, VOC, PM₁₀ and PM_{2.5} emission and localized NO_x, PM₁₀ and PM_{2.5} emissions from the proposed are significant, mitigation should be added to reduce emissions from TRUs and/or yard hostlers, if their use is allowed.

Cumulative Air Quality Analysis

The Draft EIR does not analyze the cumulative impacts from onsite rail emissions or onsite subsurface clean-up activities. The project description describes the California Regional Water Quality Control Board, Los Angeles Region (LARQWCB) adopted Order No. 85-17. The Draft EIR states “Remedial activities planned and/or performed to date include tar and soil excavations, recovery of light nonaqueous phase liquids (LNAPL), groundwater extraction and treatment, and hydraulic containment (boundary control) to mitigate further off-site migration of dissolved-phased chemicals in groundwater from the eastern site boundary, and, where applicable, LNAPL plumes. The site is to be prepared for redevelopment through planned remediation activities and/or through engineered and/or institutional controls. Most revitalization areas at the site are expected to require additional assessment, controlled excavations, and/or off-site management of excavated soil.” It is not clear if planned soil extraction and/or vapor extraction would begin or occur at the same time as the proposed project. The Final EIR should identify any known planned site clean-up that would generate air quality impacts that may have a cumulative effect on air quality (include impacts from toxic air contaminants).

The project description also states “The railroad tracks associated with the East Distribution Facility continue to function as before but may include the realignment of a portion of the westerly spur to eliminate crossing the proposed extension of Tajauta Avenue into the site and for operational flexibility.” No discussion of operational air quality impacts from this realignment was identified in the Draft EIR. It is also unclear if the additional tanks proposed for this project will require greater rail activity. The Final EIR should discuss impacts from operational air quality impacts from the realignment of the westerly spur and from any potential change to rail activity due to increased petroleum activities onsite.

Mitigation Measures

The Draft EIR includes the following mitigation measure “require the use of 2010 diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) upon revitalization area commercial project build-out.” It appears that this mitigation measure only applies to trucks related to the commercial areas of the project and only at build-out, which may not occur until 2030. CARB regulations already require nearly 100 percent use of 2010 trucks by 2023. There is also no discussion on how this mitigation measure would be implemented, enforced or what exemptions or alternatives could be used if certain trucks could not meet this requirement. The mitigation measure should be clarified to include specific implementation language and enforcement measures, such as language in lease agreements or hauling contracts. Exemptions should be listed (e.g., heavy-duty trucks that do not routinely visit the project site, etc.) and, alternatives should be proposed for the exemptions.

Because this project would also place industrial land uses with potential for toxic and odorous emissions in close proximity to sensitive receptors, the lead agency should consider providing additional buffer zones along the outside of the project boundary.