



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: NOVEMBER 13, 2007

November 13, 2007

Mr. Max Castillo
City of Carson
Planning Department
701 East Carson Street
Carson, CA 90745

Draft Environmental Impact Report (Draft EIR) for the Proposed BP Crude Logistics Optimization Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph. D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC070926-01
Control Number

Project Description

1. On page 5-11 of the Draft EIR, the lead agency describes 13 to 17 internal floating roof storage tanks located on three to five tank farms at Pier 400, Berth 408. According to the permit applications received by the SCAQMD, the Pier 400 project proposes 18 internal floating roof tanks including a surge tank located on two tank farms. This apparent discrepancy in the project description, and associated impacts, should be reconciled in the Final EIR.

Operation Emissions

2. The lead agency on page 3.1-7 cites the following SCAQMD rules that apply to the proposed project activities: Rule 463 – Organic Liquid Storage; Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants; Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities. In addition to these rules, the lead agency should also cite compliance with SCAQMD Regulation XIII – New Source Review; Rule 1401 – New Source Review for Toxic Air Contaminants; and Code of Federal Regulations Title 40 Part 60 Subpart K(b) (New Source Performance Standards for Volatile Organic Liquid Storage Vessels).
3. On page 3.1-7, the lead agency states, in part “Although Rule 1178 exempts crude oil storage tanks from covered roof requirements, BP has elected to install self-supporting covered roofs.” Although the SCAQMD Rule 1178 exempts crude oil external floating roof storage tanks from the domed roof requirements, the lead agency is reminded that the domed roof is required to comply with Regulation XIII – New Source Review as part of the Best Available Control Technology Requirements. It is not unclear as to whether a “self-supporting covered roof” qualifies as a dome roof, but if it is a “floating roof”, then the “self-supporting covered roof” would not comply with Regulation XIII.
4. On page 3.1-11 of the Draft EIR, reports Reactive Organic Gases (ROG) emissions in Table 3.1-6. The ROG emissions, however, cannot be verified without the actual tank design and component count for the project. In the Final EIR, the lead agency should provide tank design and component count for the proposed project for permitting purposes. In addition, the Draft EIR based throughput on 100 turnovers per year. In order to determine the amount of offset required for air quality permitting purposes, a maximum calendar monthly turnover is required and should be included in the Final EIR.
5. In the Final EIR, the lead agency (see comment #1) should include an estimate of emissions of toxic air contaminants and assess their potential health impacts from the proposed project.

Construction Mitigation Measures

6. Because the construction air quality impacts exceed the SCAQMND daily significance threshold for PM_{2.5} (fugitive dust) and NO_x emissions, the SCAQMD recommends the lead agency consider implementing the following mitigation measures in addition to the measures listed in Section 3.1.6. (Mitigation Measures) on pages 3.1-16 and 3.1-17 for construction, if applicable and feasible:

Recommended additions:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Replace ground cover in disturbed areas as quickly as possible;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Use alternative clean fueled off-road equipment or give extra points in the bidding process for contractors committing to use such equipment;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Reroute construction haul trucks away from congested streets or sensitive receptor areas; and
- Improve traffic flow by signal synchronization.