



September 4, 2001

Chevron Products Company  
El Segundo Refinery  
324 94, El Segundo Boulevard  
El Segundo, CA 90245  
(310) 645-5800

Comments on Draft EIR—Chevron Products Company

Ms. Kathy C. Stevens  
Air Quality Specialist—CEQA Section  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, CA 91765-4182

Dear Ms. Stevens:

Chevron is pleased to submit the following comments on the Draft Environmental Impact Report for the CARB Phase 3 Clean Fuels Project at the El Segundo Refinery. Our comments are minor and are included in the body of this letter. I am sending a copy of this letter to Mr. Richard A. Simon of ENSR for his use in making the necessary revisions to the document.

- 1-1
1. Page 1-3, Paragraph 2, Line 5  
The EIR states that the project consists of "the construction of one new unit, and replacements and modifications to several existing process units." The new unit referred to in this sentence is the Iso-octane Plant, which has been removed from the project scope. Please delete the reference to the construction of one new unit.

1-2

  2. Page 2-7, Paragraph 2, Lines 7 and 8  
This paragraph refers to the Governor's Executive Order requiring the elimination of MTBE from gasoline in California. In point of fact, Chevron has manufactured and blended two ethers into our gasoline, methyl-tertiary-butyl ether (MTBE) and tertiary-amyl-methyl ether (TAME). As part of our project, both the TAME and MTBE Plants are being permanently removed from service. Some equipment in each plant will be reused as part of our CARB Phase 3 Project, but the majority of the equipment in both plants will be demolished. The EIR should be changed throughout to reflect the fact that both the MTBE and TAME Plants are being shutdown.

1-3

  3. Page 2-12, Paragraphs 1 and 2  
This section describes the shutdown of part of the TAME Plant as part of the phase out of ether blending in El Segundo. As discussed above, both the TAME and MTBE Plants will be shutdown. Both of these plants used methanol as a feedstock, so shutting them down eliminates the need for importing methanol into the Refinery. This section describes the shutdown of the TAME Plant in detail but ignores the shutdown of the MTBE Plant. Please include the fact that the MTBE Plant is also being shutdown and

1-3  
cont.

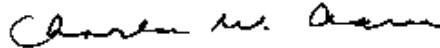
dismantled in this part of the document. In the original project scope, the MTBE Plant was going to be converted into an Iso-octene Plant. This has since been removed from the project scope. The document should clearly state that both the MTBE and TAME Plants will be permanently removed from service.

1-4

4. Page 2-26, Section 2.7.1  
Lines 2 and 3 of the first paragraph of this section again mention that the MTBE Plant will be converted to an Iso-octene Plant. The document needs to be changed to reflect the fact that this is no longer part of the project scope.

If you have any questions about the information discussed above or if you wish to discuss it in more detail, please call me at (310) 615-5285.

Sincerely,



Charles W. Aarni  
Regulatory Agency Liaison

Cc: Richard A. Simon, ENSR

**Response to Comment from Chevron Correspondence dated September 4, 2001**

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- 1-1 The discussion of the Iso-octane Plant has been removed from Page 1-3 and the EIR has been updated to reflect this comment. The Iso-octane Plant was not included in the analysis sections of the EIR; therefore, this change does not affect the conclusions in the EIR.
- 1-2 The EIR has been clarified to state that the Chevron Refinery currently manufactures both MTBE and TAME. The EIR also discusses the current and future uses for the MTBE and TAME plants. Please note the current and future uses of these plants were previously included as the basis for the EIR analysis; therefore, these clarifications do not affect the conclusions of the EIR.
- 1-3 The EIR has been revised to state the MTBE and TAME plants will be shut down as part of the project. As stated above these clarifications do not affect the conclusions of the EIR.
- 1-4 As discussed in response to comment 1-1 above, the EIR text, including the text on Page 2-26, has been updated to delete the Iso-octane Plant.

SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90047-3435

(213) 236-8800

F (213) 236-8825

www.scag.ca.gov

Office: 818 West Seventh Street, 12th Floor, Los Angeles, CA 90047-3435

Los Angeles County: ... San Bernardino County: ... Ventura County: ... Kern County: ...

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Imperial County: ... San Bernardino County: ...

San Bernardino County: ...

Ventura County: ...

Orange County: ...

Imperial County: ...

August 30, 2001

Ms. Kathy C. Stevens
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765

RE: SCAG Clearinghouse I20010482 Proposed Chevron El Segundo California Air Resources Board Phase 3 Reformulated Gasoline Project

Dear Ms. Stevens:

We have reviewed the above referenced document and determined that it is not regionally significant per Areawide Clearinghouse criteria. Therefore, the project does not warrant clearinghouse comments at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at that time.

A description of the project will be published in the September 1, 2001 Intergovernmental Review Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867.

Sincerely,
Jeffrey M. Smith
JEFFREY M. SMITH, AICP
Senior Planner
Intergovernmental Review

2-1

2-2

2-3

**Response to Comment from Southern California Association of Governments  
Correspondence dated August 30, 2001**

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- 2-1 The SCAQMD understands that, pursuant to the Areawide Clearinghouse criteria, the proposed Chevron project is not regionally significant. Minor modifications to the proposed project have occurred since release of the Draft EIR, but these minor modifications do not change any of the conclusions reached in the Draft EIR or constitute significant new information triggering recirculation of the document pursuant to CEQA Guidelines §15088.5.
- 2-2 The SCAQMD understands the project description will be published in the Intergovernmental Review Report. No response required.
- 2-3 The SCAQMD will use the SCAG Clearinghouse Number I20010482 in future correspondence. No response required.



# City of Huntington Beach

2000 MAIN STREET

CALIFORNIA 92648

## DEPARTMENT OF PLANNING

Phone 536-5271  
Fax 374-1540  
374-1648

September 6, 2001

Ms. Kathy Stevens  
SCAQMD  
21865 E. Copley Dr.  
Diamond Bar, CA 91765

**Subject: Draft Environmental Impact Report (EIR) for the Proposed Chevron - El Segundo Refinery CARB Phase 3 Clean Fuels Project, SC# No. 20000810888**

Dear Ms. Stevens:

The City of Huntington Beach has reviewed the subject Draft EIR for the proposal that involves modifications to the Chevron Terminal located at the northwest corner of Gothard Street and Talbert Avenue in the City of Huntington Beach. The City of Huntington Beach has the following comments on the project and environmental document:

- 3-1 1. An additional 12 truck trips per day are anticipated once the project is completed. New development is required to mitigate traffic impacts by paying a traffic impact fee to the City of Huntington Beach. The fee for this project is \$120 per additional daily trip. Using a passenger car equivalent of 2.0, the fee for this project would be \$2,880 (12\*2\*\$120). This fee is due and payable prior to issuance of building permits.
- 3-2 2. With the tank conversion from diesel to ethanol storage, the floating roof should not have any rubber parts due to deterioration potential.
- 3-3 3. Page 4-82 -- The reference to the construction of a new ethanol storage tank is inconsistent with the project description and should be corrected.

The following items are related to mitigating potential hazard impacts:

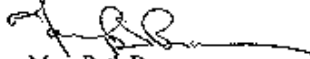
- 3-4 4. An automatic fire suppression and monitored fire alarm shall be installed throughout the site. Shop drawings shall be licensed by a State licensed fire protection engineer and must be approved by the City Fire Department prior to system installation.

Ms. Kathy Stevens  
September 6, 2001  
Page 2 of 2

- 3-5 5. Fire access roads shall be provided in compliance with City Specification 401. A Circulation Plan and dimensions of all access roads should be included.
- 3-6 6. A Fire Protection Plan, in compliance with City Specification 426, must be approved by the City Fire Department prior to construction.
- 3-7 7. Fire extinguishers shall be installed and located in areas to comply with City Fire Department standards in City Specification 424.
- 3-8 8. Information regarding secondary containment for all on-site tankage shall be provided to the City Fire Department for review and approval.
- 3-9 9. A drainage plan for existing and additional fire protection deluge systems should be provided to the City Fire Department.

Thank you for the opportunity to comment on the project. If you have any questions please contact me at (714) 536-5550.

Sincerely,



Mary Beth Broeren  
Senior Planner

Encl.

**Response to Comment from the City of Huntington Beach Correspondence dated September 6, 2001**

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- 3-1 Although this comment references the 12 additional truck trips per day to the Huntington Beach terminal generated by the proposed project, the primary intent of the comment relates to fees and approvals subsequent to the SCAQMD's certification of the EIR. Subsequent fees and approvals are matters that are between the City of Huntington Beach and the project proponent.
- 3-2 Minor modifications will be made to allow the tank to be converted from diesel to ethanol. Chevron is aware of compatibility issues between various liquids and floating roof seal materials. To address these issues Chevron has established several service categories, which identify various product groups and seal materials that are compatible with each group. One of these categories is applicable to both methanol and ethanol and prohibits the use of certain seal materials that have not provided good service when exposed to these products. For example, urethane primary and secondary seal fabrics are not allowed in ethanol service. Teflon and hypalon are allowed along with buna-nitrile on a fiberglass fabric. For secondary seal tips, solid buna nitrile material is not allowed while a PVC/nitrile blend is allowed.
- 3-3 This page (4-82) of the Draft EIR incorrectly identified a new ethanol storage tank at the Huntington Beach Terminal. The text on this page has been revised to delete reference to the new tank and be consistent with the project description and evaluation of environmental impacts in the remainder of the EIR.
- 3-4 Detailed design drawings of the fire suppression and alarm system will be submitted to the City and City Fire Department during the local permitting and review process by Chevron.
- 3-5 The design of fire access roads and required circulation plan will be submitted during the local permitting and review process by Chevron.
- 3-6 A Fire Protection Plan will be submitted during the local permitting and review process by Chevron.
- 3-7 Plans for fire extinguishers will be submitted to the City Fire Department during the local permitting and review process by Chevron.
- 3-8 Information regarding secondary containment for on-site storage tanks will be submitted during the local permitting and review process by Chevron.
- 3-9 The drainage plan for the fire protection deluge system will be submitted during the local permitting and review process by Chevron.





# City of Montebello

September 10, 2001

Ms. Kathy Stevens  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, CA 91765

RE: CHEVRON-EL SEGUNDO REFINERY CARB PHASE 3 CLEAN FUELS PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT (DRAFT EIR) – SCH#2000081088

Dear Ms. Stevens:

City of Montebello appreciates the opportunity to comment on the Draft EIR. The following are the City's comments on the document.

1. In general, the analysis in the Draft EIR is suspect as it relates to the Montebello Terminal, because the description of operations as portrayed in the Draft EIR may not accurately reflect the actual operations as described by representatives of Chevron and Chevron's consultant (Newtech Resources). In earlier meetings with Chevron, City staff indicated that an increase in truck traffic is not considered desirable.  
4-1
2. Therefore, the consultant indicated that the ethanol could come to the Montebello Terminal by rail only. The most recent scenario provided to City staff by Chevron and their consultant (Newtech Resources) involved 12 empty cars and 12 full cars to the site three to five times per week, Monday through Friday between the hours of 10:00 a.m. and 1:00 p.m. The EIR indicates that there will be a total of eight rail cars between 9:00 a.m. and 11:00 a.m., and does not indicate the number of times per week the rail cars will come to the site. The EIR also indicates that 23 tanker trucks per day will also be coming to the Montebello Terminal. The EIR should be revised to reflect the most recent proposal.  
4-2
3. The traffic impact analysis provided in the Draft EIR did not address the full traffic impact caused by this project. Due to the lack of information regarding the delay time of loading/unloading of ethanol rail cars, the applicant shall contact the Public Works Department for detailed guidelines of a detailed traffic impact study. This can be done when Chevron comes in for a permit to construct.  
4-3
3. In order to determine the impacts of different modes of transporting the ethanol to the Montebello Terminal, the following alternatives should be analyzed in a Draft EIR that is re-circulated for public review. In addition, the railroad system in the City may be placed below grade in the future, through the Alameda Corridor – East Construction Authority (ACE) project.

4-4	<p>a. Rail Alternative - This alternative would involve an analysis of transporting the ethanol by rail only. The alternative should consider the maximum number of rail cars that would be used at any given time. Sufficient detail should be provided so that the traffic impacts and impacts to emergency response systems resulting from the signal arms being down at the rail crossings can be assessed.</p> <p>Underground Railroad - The rail system in Montebello may be placed below grade as part of the ACE project. This scenario should be addressed as part of the analysis.</p> <p>b. Rail and Truck Alternative - This alternative would involve an analysis of transporting the ethanol by rail and by truck. Sufficient detail should be provided so that the traffic impacts and impacts to emergency response systems resulting from the signal arms being down at the rail crossings can be assessed. Proposed truck routes should also be assessed as part of this alternative.</p> <p>Underground Railroad - The rail system in Montebello may be placed below grade as part of the ACE project. This scenario should be addressed as part of the analysis.</p> <p>c. Truck Alternative - This alternative would involve an analysis of transporting the ethanol by truck only. Sufficient detail should be provided so that the traffic impacts can be assessed. Proposed truck routes should also be assessed as part of this alternative.</p>
4-5	<p>4. The design of the Chevron rail project, as provided in the Draft EIR, will have a significant impact on our City. A revised design is needed to ensure minimum impact at all railroad crossings, and is subject to the City Engineer's review and approval.</p>
4-6	<p>5. Figure 2.6-2 does not show the most recently proposed rail configuration for the Montebello Terminal.</p>
4-7	<p>6. As a result of the discrepancy between the project description as included in the Draft EIR, and the project description provided to the City by representatives of Chevron and Chevron's consultant, the City of Montebello is unable to clearly determine the impacts. As stated above, an alternatives analysis should be prepared and included in a Draft EIR.</p>
4-8	<p>7. The Project Description indicates that construction at the Montebello Terminal will take place Monday through Friday, from 8:30 a.m. to 5:00 p.m. The Montebello Municipal Code (MMC) provides that construction shall not begin until 7:00 a.m.</p>
4-9	<p>8. Page 3-55 describes how storm water is inspected before it is released into the City's storm drain system. Please provide documentation of this process.</p>

9. Page 3-69, Table 3.8-1, which describes local noise guidelines and ordinances, is not accurate. The table should be modified for the Montebello Terminal as follows:

Construction Limit - 7:00 a.m. to 8:00 p.m. Monday through Friday  
9:00 a.m. to 6:00 p.m. Saturday and Sunday

Operations Limits -

Adjacent Zone	Maximum Noise Level	
	7 a.m. to 10 p.m.	10 p.m. to 7 a.m.
Residential	65dBA	60dBA
Commercial	70dBA	70dBA
Industrial	75dBA	75dBA

4-10

Given this information, the maximum noise levels allowed for Montebello Terminal near the residential uses adjacent to the site on the north would be 65 dBA to 60 dBA, depending on the time of day.

Page 4-87 contains the statement that maximum construction noise at the Montebello Terminal is predicted to be 82 dBA at the nearest residences. Because construction is temporary, noise impacts from construction are considered less than significant. Mitigation measures need to be included in the EIR that address construction noise impacts on adjacent residences. For example, temporary walls could be built around the area of construction to attenuate noise.

This section of the EIR should be revised to address these issues.

4-11

10. Tables 4.1-8 and 4.1-9 show air quality impacts, apparently for all terminals combined. The description of impacts should be shown and discussed for each terminal location. There is no way to determine the impacts at the individual terminals as described in the referenced tables.

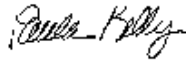
4-12

11. Page 4-106, Operational Impacts. The section states that vehicular traffic on Vail Avenue will be affected by the movement of the rail cars. In fact, the movement of the rail cars will trigger the signal arms on Vail, Maple, Greenwood Avenues, and Montebello Boulevard. This will create a significant back up of vehicles on these roadways. There is no analysis of when the signal arms will be triggered, how long they will be down, and how many vehicles will be delayed for how long. These roadways are the major north-south streets in the City.

In addition, blocking this number of intersections will significantly effect emergency response times to the southern portion of the City. Simply notifying emergency services of the scheduled road blockages is not adequate mitigation for this impact.

- 4-13 12. While not required by CEQA, it would be helpful to have the Mitigation Monitoring Program included in the Draft EIR. This would give the public an opportunity to review and comment on the effectiveness of the mitigation measures and monitoring.
- 4-14 13. The alternatives analysis focuses on decreasing significant air quality and hazards impacts. Also, there is no discussion that addresses the significant impacts at the Montebello Terminal related to traffic and circulation in that section.
- 4-15 Staff would reserve final comment on the alternatives until a full and accurate project proposal and analysis is completed. If you have any questions regarding these comments, please call Paula Kelly at 323-887-1481.

Sincerely,



Paula Kelly  
Associate Planner

**Response to Comment from the City of Montebello Correspondence dated  
September 10, 2001**

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- 4-1 The Draft EIR was prepared based on the information available at the time, and conclusions contained in the Draft EIR are unchanged. The SCAQMD disagrees with the City's assertion that the analysis of potential adverse environmental impacts in the Draft EIR is somehow "suspect". Common to this, and many other projects, the project definition continues to be refined as additional design and engineering details become available. The EIR has been revised where appropriate to include the most recent project information available regarding the Montebello Terminal including the number of railcars, hours of operation, and operating procedures. The revised project description information is included in Section 2.6.3 of the EIR. It is important to note that none of the impact determinations or mitigation measures have substantively changed based on the more current information. Further, these minor modifications to the project description do not constitute significant new information that triggers recirculation of the Draft EIR pursuant to CEQA Guidelines §15088.5

Chevron's proposed project includes both rail and truck for ethanol import and export from the Montebello Terminal. The City's concern regarding additional truck trips is noted. Please note the addition of 23 truck trips per day (27 truck trips were assumed in the Draft EIR) will not create a significant impact to the transportation/circulation system in the vicinity of the Montebello Terminal. The analysis contained in the Draft EIR was prepared based on a "worst-case" scenario to fully capture possible impacts. The revised project information does not create significant impacts beyond those discussed in the Draft EIR.

Information available to the SCAQMD subsequent to the release of the Draft EIR has been incorporated, as appropriate, into the EIR. The EIR is complete and describes the potential impacts of the proposed project. Agreements between the City and Chevron subsequent to certifying the EIR are part of the local permitting/approval process.

- 4-2 The SCAQMD disagrees with the City's opinion that the Draft EIR did not fully address potential traffic impacts from the proposed project. As a result of this comment however, and due to subsequent information on the proposed project provided by the project proponent, the traffic impact discussion in the EIR has been expanded. Details regarding rail car movements and street interruptions are included in the text. The conclusions of the EIR remain unchanged. As required by the City, Chevron will be responsible for any additional information required during the City's permit and approval process, and subsequent to the certification of the Final EIR.
- 4-3 Pursuant to CEQA Guidelines §15126.6(a) an EIR shall describe a range of reasonable alternatives to the project. Further, an EIR need not consider every

conceivable alternative. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. The range and analysis of alternatives in the Draft EIR comply with these and all other relevant requirements pertaining to identifying and comparing the relative merits of project alternatives. Refer to response #4-4 regarding the specific alternatives recommended by the city of Montebello.

As discussed in response to Comments 4-1 and 4-4 further planning and design of the project has determined the project requirements for operating the train have reduced the maximum closure time along Vail Avenue by more than 50 percent compared to what had been assumed in the Draft EIR. The impacts as they relate to truck and train for the operation of the project, as modified, have been revised in the Final EIR based on additional project development. The impacts are equal to or less than those described in the Draft EIR and continue to remain not significant. Therefore the analysis of additional alternatives and recirculation of a Draft EIR is not necessary.

- 4-4 The EIR contains a conservative “worst-case” analysis of the impacts of the different modes of transporting ethanol to the Montebello Terminal. The EIR assumes the maximum number of train and truck trips for any of the operating scenarios proposed by Chevron. As the EIR impact assessment is based on the maximum number of train and truck trips assuming 100 percent of the ethanol is transported by both modes each day, the potential impacts of the alternatives described in the comment are equal to or less than those included in the EIR.

a.) Rail Alternative – The EIR analysis is based upon the maximum number of rail car trips. Based on this and other comments additional details regarding the operations of the rail crossings has been included in the EIR. A “rail only” alternative has not been included because the source of ethanol has not been selected and it may change over time. Ethanol is expected to be brought to southern California via marine tanker to the port and/or via rail from the mid-west. Ethanol transported via ship will have to be trucked to distribution facilities, such as the Montebello Terminal. If “rail only” were allowed the terminal may not be able to receive ethanol and distribute the reformulated gasoline. Therefore the “rail-only” alternative is not considered feasible.

Also note that ethanol received at the Montebello Terminal via rail may be transported out of the terminal via trucks to other local Chevron terminals. The EIR contains a conservative “worst case” analysis of the impacts of the different modes of transporting ethanol to the Montebello Terminal. The EIR assumes the maximum number of train and trucks trips for any of the operating scenarios proposed by Chevron. As the EIR impact assessment is based on the maximum number of train and truck trips assuming 100 percent of the ethanol is transported by both modes each day, the potential impacts of the alternatives described in the comment are equal to or less than those included in the EIR.

At this time it is uncertain if the railroad system in the City will be placed below grade. CEQA Guidelines §15145 recommends against evaluating potential environmental impacts that are speculative in nature. Therefore an alternative assuming an “Underground Railroad” is not be assessed in the EIR.

b.) Rail and Truck Alternative – The “Truck and Rail Alternative” as described earlier in this comment is included as the proposed project in the EIR. As discussed above additional detail relating to traffic impacts and emergency response systems has been included in the EIR. To ensure ethanol is available for blending into reformulated gasoline, both rail and truck transportation have been proposed. See response to #4-4a above regarding the Underground Railroad.

c.) Truck Alternative – The EIR analysis is already based on the maximum number of truck trips for individual days when ethanol is transported via truck or rail to the Montebello terminal. Therefore the potential impacts of a “truck only” alternative have already been included in the EIR. The maximum number of truck trips (23 per day) will not create a significant adverse impact. As the total number of additional truck trips is small a study of truck routes is not required.

- 4-5 The analysis contained in the EIR indicates noise generated during the rail operations at the Montebello Terminal will have a significant impact on residences located to the north of the terminal. As discussed in Section 4.8.4.2 of the EIR, numerous mitigation measures were evaluated to reduce the noise impact; however, they were determined infeasible.

The “worst case” rail operations including the maximum four-minute closure of Vail Avenue and two-minute closure of Maple Avenue is not considered a significant transportation/circulation impact.

Chevron will be required to obtain the necessary permits and approvals from the City of Montebello. As appropriate the project design will be subject to the City Engineer’s review and approval.

- 4-6 Figure 2.6-2 has been revised to reflect the most current project information. The revised figure includes the layout for 12 (compared to eight) rail cars and the new location of the rail spur further west from Vail Avenue.

- 4-7 The apparent discrepancy refers to the description of the proposed project in the Draft EIR and the minor changes to the proposed project discussed with the city subsequent to the release of the Draft EIR. The Final EIR has been clarified to present more refined project information. Apparent discrepancies have been resolved. Common to this, and many other projects, the project definition continues to be refined as additional design and engineering details become available. The EIR has been revised where appropriate to include the most recent project information available regarding the Montebello Terminal including the number of railcars, hours of operation, and operating procedures. The revised

project description information is included in Section 2.6.3 of the EIR. It is important to note that none of the impact determinations or mitigation measures have substantively changed based on the more current information.

The analysis is a “worst-case” analysis based on the SCAQMD’s knowledge of the project as it currently is. The “worst-case” analysis includes the conservative assumptions, per response #4-4, that 100 percent of the ethanol would be transported by truck and 100 percent by rail because of the uncertainty of the origin of the ethanol. Any subsequent agreements with the city of Montebello would likely be within the scope of the analysis because some portion of the ethanol transported would be by truck and the remaining portion would be transported by rail.

As discussed in response to comment #4-3 and #4-4 a new alternatives analysis is not required. Additionally a revised Draft EIR is not required. No conclusions regarding potentially significant impacts have changed. Therefore there is no basis for recirculation of a Draft EIR.

- 4-8 The project and EIR have been revised as required by the Montebello Municipal Code to reflect that construction will not occur before 7:00 A.M. This modification does not affect the traffic analysis as construction workers would still arrive on site prior to the start of the morning peak hours.
- 4-9 The discussion relating to the inspection of storm water on page 3-55 of the Draft EIR is based upon information provided by Chevron and contained in the Spill Prevention, Control and Countermeasures Plan (SPCC) for the Montebello Terminal. Within the SPCC the information is specifically included in “Conformance with Guidelines, Spill Prevention and Containment Procedures (40 CFR part 112.7(e))” Section (2)(iii). A copy of the SPCC for the Chevron Montebello Terminal will be sent to the City along with this response.
- 4-10 Table 3.8-1 in the EIR has been revised per the comment. The correction to the Table does not change the conclusion for operational impacts which is considered significant. As discussed in Section 4.8.4.2 of the EIR no feasible mitigation measures were identified to reduce the noise impacts from operation of the rail to below significance.

The comment regarding construction noise indicates agreement with the short-term noise assessment in the EIR. This comment also suggests an additional mitigation measure. Limiting construction to Monday through Friday and between 7:00 AM and 6:00 PM reduces the potential impact to below significance. In addition the EIR proposes other measures to minimize noise during construction (See Table 4.8-4 of the EIR). Mitigation Measure N-2 requires shielding noise sources from receptors when feasible. While this will become a requirement of the project, the impact will remain below significant even if it is later determined that shielding is not feasible.



4-11 Tables 4.1-8 and 4.1-9 are presented to provide the reader with a summary of the total project emissions. These tables include emissions from the three terminals, refinery, and indirect sources such as from the transportation of ethanol. For potential emissions specifically related to the Montebello and other terminals the commentator is referred to Table 4.1-6. Additional emission information is included in Appendix B to the EIR.

4-12 As discussed in responses #4-1 and #4-7, as the development of the project has continued, additional design and operation details have become available. The additional details have been included in the revision to Section 4.11.2 of the EIR. The additional details include the servicing sequence for the rail car deliveries, the estimated time required for each of the operations, and the practices to be followed by the operating engineer regarding street interruptions and approaching emergency vehicles. The railroad operating practices that were not available at the time of the Draft EIR will further reduce transportation/traffic impacts as:

- the engineer operating the locomotive will not re-interrupt a street crossing, under normal circumstances, until delayed vehicle traffic has cleared the crossing, and
- if an emergency vehicle is seen or heard approaching the street crossing by the train crew, then the engineer will immediately clear the crossing.

Based on the refined project description, impacts are expected to be similar or less than those discussed in the Draft EIR. The Draft EIR assumed daily Vail Avenue interruptions up to 10 minutes at a time, the more detailed information indicates the longest continuous closure of Vail Avenue to be up to four minutes. The comment discusses the trigger of signal arms on Vail, Maple, and Greenwood Avenues and Montebello Boulevard. The signal arms on Greenwood Avenue and Montebello Avenue will not be triggered by the deliveries of ethanol to the Montebello Terminal, as the train is expected to approach and return from the west. Vail Avenue will be affected as discussed above and more completely in Section 4.11.2 of the EIR and Maple Avenue will be interrupted up to two minutes during the delivery sequence. The potential impacts to transportation/circulation from delivery of ethanol to the Montebello Terminal remain less than significant.

4-13 The SCAQMD does not typically include the Mitigation Monitoring Plan in the Draft EIR because of the possibility that mitigation measures may be changed, added, or deleted. Regardless, the public is provided the opportunity to review and comment on the effectiveness of the mitigation measures because, to the extent they were known at the time the Draft EIR was made available for public review, they were included in the Draft EIR. The Plan will be prepared prior to certification of the EIR. A copy of the Plan will be provided to the City when the details of the mitigation measures become finalized.

- 4-14 The transportation/circulation analysis in the EIR indicates impacts related to the proposed project in the vicinity of the Montebello Terminal are not significant. The “worst-case” impacts from 23 trucks per day, and maximum continuous closure of Vail Avenue for four minutes and Maple Avenue for two minutes are not considered significant. As discussed in response to comments #4-3 and #4-4 an additional alternative analysis is not required for transportation/circulation related to the Montebello Terminal.
- 4-15 As explained in responses to comments #4-3, #4-4 and #4-14, further analysis of project alternatives is unwarranted and therefore not required. The project description in the Draft EIR was as accurate as possible at that stage of project design. Because of uncertainties associated with some components of the proposed project, the scope of the project is broadened to provide a conservative analysis to ensure that the public is informed of all potential impacts that could be generated by the proposed project.



Winston H. Hickox  
 Agency Secretary  
 California Environmental  
 Protection Agency

## Department of Toxic Substances Control

Edwin F. Lowry, Director  
 5796 Corporate Avenue  
 Cypress, California 90630



Gray Davis  
 Governor

August 28, 2001

Ms. Kathy C. Stevens  
 South Coast Air Quality Management District  
 21865 East Copley Drive  
 Diamond Bar, California 91765-4182

**NOTICE OF COMPLETION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
 CHEVRON – EL SEGUNDO REFINERY CALIFORNIA AIR RESOURCES BOARD  
 PHASE 3 CLEAN FUELS PROJECT, SCH. No. 2000081088**

Dear Ms. Stevens:

The Department of Toxic Substances Control (DTSC) has received your Notice of Completion of a draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

5-1

Section 4.10.2 of the draft EIR states that the proposed modifications to the Refinery's Alkylation Unit Deisobutanizer would generate approximately 356 cubic yards of potentially hazardous soil with unknown type of wastes. The draft EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

5-2

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). Also, DTSC is administering the \$85 million Urban Cleanup Loan Program (UCLP), which provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. The program is composed of two main components: low interest loans of up to \$100,000 to conduct preliminary endangerment assessments of underutilized properties; and loans of up to

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

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Ms. Kathy C. Stevens  
August 28, 2001  
Page 2

5-2  
cont.

\$2.5 million for the cleanup or removal of hazardous materials also at underutilized Urban properties. These loans are available to developers, businesses, schools, and local governments.

For additional information on the VCP or UCLP, please visit DTSC's web site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov). If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me, at (818) 551-2877.

Sincerely,



*fr*  
Harlan R. Jeché  
Unit Chief  
Southern California Cleanup Operations Branches

Enclosure

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief  
Planning and Environmental Analysis Section  
CEQA Tracking Center  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

**Response to Comment from Department of Toxic Substances Control  
Correspondence dated August 28, 2001**

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- 5-1 As discussed in the EIR limited excavation will occur in an area formerly used as a waste disposal site. Final construction plans for this area have not yet been developed. Chevron will either sample the area prior to excavation or sample the material after excavation to determine the proper characterization of the waste. A representative number of samples will be collected and submitted to a State certified hazardous waste laboratory. Based on the laboratory results Chevron will obtain the necessary permits and approvals, if any, for disposal of the waste.
- 5-2 The Chevron Refinery is not expected to be eligible for funds under the Urban Cleanup Loan Program because the refinery is not located within an underutilized area where redevelopment is likely to have beneficial impacts to the community.

**DEPARTMENT OF TRANSPORTATION**

OFFICE OF ADVANCE PLANNING  
DISTRICT 7, IGR OFFICE 4-11B  
120 SOUTH SPRING STREET  
LOS ANGELES, CA 90012  
TEL: (213) 897-6536 ATSS: 8- 647-6536  
FAX: (213) 897-8906



Ms. Kathy C. Stevens  
CEQA Review Section  
South Coast Air Quality Management District  
21865 East Copley Drive  
Diamond Bar, CA. 91765-4182

RE: IGR/CEQA # 010781NY  
DEIR-Chevron-El Segundo Refinery  
SCH# 2000081088  
LA / 001/24.9&LA/405/40.08

August 23, 2001

Dear Ms. Stevens:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Chevron-El Segundo Refinery Phase 3 Clean Fuels Project.

6-1

We would like to remind you that any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods.

If you have any questions regarding this response, you can reach me at (213) 897-4429 and refer to IGR/CEQA # 010781NY.

Sincerely,

A handwritten signature in cursive script that reads "Stephen J. Buswell".

For:

STEPHEN J. BUSWELL  
IGR/CEQA Branch Chief  
Transportation Planning Office  
Caltrans, District 7

**Response to Comment from Department of Transportation Correspondence dated August 23, 2001**

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- 6-1 As referenced in Table 2.9-1 of the EIR, Chevron will obtain a Caltrans transportation permit for the transportation of heavy construction equipment and/or materials, which require the use of oversized-transport vehicles on State highways. Scheduling of the delivery of over-sized equipment and materials during construction and operation will be conducted to the maximum extent possible during off-peak hours to minimize traffic impacts.