
APPENDIX F

COMMENTS RECEIVED ON DRAFT EIR

AND RESPONSES



South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • <http://www.aqmd.gov>

September 5, 2001

State of California
Department of Transportation
Office of Regional Planning
District 7, IGR/CEQA 1-10C
120 So. Spring Street
Los Angeles, CA 90012

Subject: Mobil CARB Phase 3 Reformulated Gasoline DEIR

The South Coast Air Quality Management District (SCAQMD) received your letter dated July 16, 2001 regarding the above referenced project. Thank you for reviewing and providing comments on the Draft Environmental Impact Report (DEIR). Pursuant to California Public Resources Code §21092.5, a copy of your comment letter and a response are enclosed. The Final EIR is expected to be certified by the SCAQMD Executive Officer by the end of September 2001.

If you have any questions, please feel free to contact me at (909) 396-3054, or Kathy C. Stevens at (909) 396-3439.

Sincerely,

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

DEPARTMENT OF TRANSPORTATION

OFFICE OF REGIONAL PLANNING

DISTRICT 7, IGR/CEQA 1-10C

120 SO. SPRING ST.

LOS ANGELES, CA 90012

TEL: (213) 897-6696 ATSS: 8- 647-6696

FAX: (213) 897-6317



July 16, 2001

IGR/CEQA cs/010702

DEIR

Torrance/Vernon/Port of Los Angeles

Mobil California CARB Phase 3

Reformulated Gasoline Project

Vic. LA-405-15.29

LA-10-16.94

LA-47-2.30

SCH # 2000081105

Mr. Johnathan D. Nadler
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765

Dear Mr. Nadler:

Thank you for including the California Department of Transportation in the environmental review process for the above-mentioned project. Based on the information received, we have the following comments:

We recommend that construction related truck trips on State highways be limited to off-peak commute periods. Transport of oversize or overweight vehicles on State highways will need a Transportation Permit from the California Department of Transportation.



1-1

Any work to be performed within State right-of-way will need an Encroachment Permit from the California Department of Transportation.



1-2

If you have any questions regarding our response, refer to our internal IGR/CEQA Record # cs/010702, and please do not hesitate to contact me at (213) 897-4429.

Sincerely,

STEPHEN BUSWELL
IGR/CEQA Program Manager

cc: Mr. Scott Morgan, State Clearinghouse

**Responses to Comments from the California Department of Transportation
Correspondence dated July 16, 2001**

- 1-1 Section 4.10 of the Draft EIR discusses Transportation/Traffic impacts. The evaluation concluded that the proposed project would not generate significant adverse transportation/traffic impacts.

Table 2.8-1 "List of Federal, State, and Local Agency Permits, Approvals, and Other Requirements" includes a permit requirement for the transportation of oversize or overweight vehicles on state highways from the California Department of Transportation.

- 1-2 As indicated in the Draft EIR, all modifications related to phasing out MTBE and complying with the CARB phase 3 reformulated gasoline specifications will occur at the Mobil refinery or Mobil's distribution terminals. Consequently, construction activities are not expected to occur within State rights-of-way. If it should be necessary to enter a state right-of-way, Mobil will acquire the necessary permits.



South Coast Air Quality Management District



21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • <http://www.aqmd.gov>

September 5, 2001

California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3348

Subject: Mobil CARB Phase 3 Reformulated Gasoline DEIR

The South Coast Air Quality Management District (SCAQMD) received your letter dated July 30, 2001 regarding the above referenced project. Thank you for reviewing and providing comments on the Draft Environmental Impact Report (DEIR). Pursuant to California Public Resources Code §21092.5, a copy of your comment letter and a response is enclosed. The Final EIR is expected to be certified by the SCAQMD Executive Officer by the end of September 2001.

If you have any questions, please feel free to contact me at (909) 396-3054, or Kathy C. Stevens at (909) 396-3439.

Sincerely,

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



California Regional Water Quality Control Board Santa Ana Region



Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb8>
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (909) 782-4130 - FAX (909) 781-6288

Gray Davis
Governor

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 website at www.swrcb.ca.gov/rwqcb8.

July 30, 2001

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

RESPONSE TO NOTICE OF COMPLETION OF A DRAFT ENVIRONMENTAL IMPACT REPORT/PROPOSED MOBIL CALIFORNIA AIR RESOURCES BOARD (CARB) PHASE 3 REFORMULATED GASOLINE PROJECT/ STATE CLEARING HOUSE NUMBER 2000081105

Dear Ms. Stevens:

The California Regional Water Quality Control Board, Santa Ana Region, (Regional Board) would like to thank you for giving the Regional Board staff the opportunity to review and comment on the proposed Mobil California Air Resources Board Phase 3 Reformulated Gasoline Project.

Staff of the Regional Board has reviewed the Notice of Completion for the above referenced project. The project involves construction of a new aboveground storage tank with associated piping and unloading rack, and modifications to existing piping and unloading racks. Therefore, Regional Board staff has the following comments:

1. Owners or operators of facilities storing petroleum in a single aboveground tank greater than 660 gallons or storing petroleum in aboveground tanks or containers with a cumulative storage capacity greater than 1,320 gallons are subject to California's Aboveground Petroleum Storage Act (APSA). 2-1
2. Owners or operators of facilities subject to APSA shall amend their current Spill Prevention Control and Countermeasure in accordance with Title 40, part 112.5 and 112.7 of the Code of Federal Regulations. 2-2
3. Owners or operators of facilities subject to APSA shall amend their Storage Statement in accordance with section 25270.6 of APSA. 2-3

If you should have any questions, please call Edward Kashak at (909) 782-3252.

Sincerely,

David G. Woelfel
Planning Section

cc: Scott Morgan – State Clearinghouse



**Responses to Comments from the California Regional Water Quality Control Board
Correspondence dated July 30, 2001**

- 6-1 The SCAQMD is aware that owners or operators of facilities storing petroleum in a single aboveground tank greater than 660 gallons or storing petroleum in aboveground tanks or containers with a cumulative storage capacity greater than 1,320 gallons are subject to California's Aboveground Petroleum Storage Act (APSA).
- 6-2 The SCAQMD is aware that the owners or operators of facilities subject to APSA must amend their current Spill Prevention Control and Countermeasure Plan in accordance with Title 40, Parts 112.5 and 112.7 of the Code of Federal Regulations.
- 6-3 The SCAQMD is aware that owners or operators of facilities subject to APSA must amend their Storage Statement in accordance with Section 25270.6 of APSA.



South Coast Air Quality Management District



21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • <http://www.aqmd.gov>

September 5, 2001

Department of Toxic Substances Control
1001 "I" Street, 25th Floor
P.O. Box 806
Sacramento, CA 95812-0806

Subject: Mobil CARB Phase 3 Reformulated Gasoline DEIR

The South Coast Air Quality Management District (SCAQMD) received your letter dated June 27, 2001 regarding the above referenced project. Thank you for reviewing and providing comments on the Draft Environmental Impact Report (DEIR). Pursuant to California Public Resources Code §21092.5, a copy of your comment letter and a response are enclosed. The Final EIR is expected to be certified by the SCAQMD Executive Officer by the end of September 2001.

If you have any questions please feel free to contact me at (909) 396-3054, or Kathy C. Stevens at (909) 396-3439.

Sincerely,

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

cc: DTSC
Sayareh Amirebrahimi
Site Mitigation
1011 North Grandview Avenue
Glendale, CA 91201



Department of Toxic Substances Control

Edwin F. Lowry, Director
1001 "I" Street, 25th Floor
P.O. Box 806
Sacramento, California 95812-0806



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

June 27, 2001

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

Re: Mobil Carb Phase 3 – Reformulated Gasoline Project

The Department of Toxic Substances Control (DTSC) is in receipt of the environmental document identified above. Based on a preliminary review of this document, we have determined that additional review by our regional office will be required to fully assess any potential hazardous waste related impacts from the proposed project. The regional office and contact person listed below will be responsible for the review of this document in DTSC's role as a Responsible Agency under the California Environmental Quality Act (CEQA) and for providing any necessary comments to your office:

3-1

Sayareh Amirebrahimi
Site Mitigation
1011 North Grandview Avenue
Glendale, California 91201

If you have any questions concerning DTSC's involvement in the review of this environmental document, please contact the regional office contact person identified above.

Sincerely,

Guenther W. Moskat, Chief
Planning and Environmental Analysis Section

**Response to Comment from Department of Toxic Substances Control
Correspondence dated June 27, 2001**

3-1 Pursuant to California Public Resources Code §21069 "Responsible Agency" means a public agency, other than the lead agency that has responsibility for carrying out or approving a project. The Department of Toxic Substances Control has not been identified as a responsible agency as defined by the CEQA statutes.

The DTSC was however, provided a courtesy copy of the Draft EIR, to review and provide substantive comments. The correspondence dated June 27, 2001 does not contain any substantive comments, and therefore requires no response.

In addition, there is a statutory deadline to comply with the Governor's Executive Order to phase out MTBE and comply with CARB Phase 3 reformulated gasoline specifications. Consequently, there is no guarantee that the SCAQMD will be able to consider comments received after the close of the comment period (August 2, 2001). Further, pursuant to CEQA Guidelines §15207, a lead agency need not respond to late comments.



South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • <http://www.aqmd.gov>

September 5, 2001

County Sanitation Districts of Los Angeles County
P.O. Box 4998
Whittier, CA 90607-4998

Subject: Mobil CARB Phase 3 Reformulated Gasoline DEIR

The South Coast Air Quality Management District (SCAQMD) received your letter dated July 18, 2001 regarding the above referenced project. Thank you for reviewing and providing comments on the Draft Environmental Impact Report (DEIR). Pursuant to California Public Resources Code §21092.5, a copy of your comment letter and a response are enclosed. The Final EIR is expected to be certified by the SCAQMD Executive Officer by the end of September 2001.

If you have any questions, please feel free to contact me at (909) 396-3054, or Kathy C. Stevens at (909) 396-3439.

Sincerely,

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



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

JAMES F. STAHL
Chief Engineer and General Manager

July 18, 2001

File No: 05-00.04-00
23-00.04-00

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

Dear Ms. Stevens:

Mobil California Air Resources Board (CARB) Phase 3 Reformulated Gasoline Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on June 18, 2001. We offer the following comment regarding sewerage service:

- All information concerning Districts' facilities and sewerage service contained in the document is currently complete and accurate.

4-1

If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717.

Very truly yours,

James F. Stahl

Ruth I. Frazen
Engineering Technician
Planning & Property Management Section

RIF:eg

**Response to Comment from County Sanitation Districts of Los Angeles County
Correspondence dated July 18, 2001**

4-1 The SCAQMD acknowledges that all information concerning the County Sanitation Districts of Los Angeles County facilities and sewerage service contained in the Draft EIR is currently complete and accurate.



South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • <http://www.aqmd.gov>

September 5, 2001

City of Placentia
401 East Chapman Avenue
Placentia, CA 92870

Subject: Mobil CARB Phase 3 Reformulated Gasoline DEIR

The South Coast Air Quality Management District (SCAQMD) received your letter dated July 20, 2001 regarding the above referenced project. Thank you for reviewing and providing comments on the Draft Environmental Impact Report (DEIR). Pursuant to California Public Resources Code §21092.5, a copy of your comment letter and a response is enclosed. The Final EIR is expected to be certified by the SCAQMD Executive Officer by the end of September 2001.

If you have any questions, please feel free to contact me at (909) 396-3054, or Kathy C. Stevens at (909) 396-3439.

Sincerely,

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

Mayor
CHRISTOPHER A. LOWE

City Administrator
ROBERT D'AMATO



Councilmembers:
CONSTANCE UNDERHILL
NORMAN Z. ECKENRODE
SCOTT P. BRADY
JUDY A. DICKINSON

401 East Chapman Avenue - Placentia, California 92870

July 20, 2001

Ms. Kathy C. Stevens
c/o Planning/CEQA
South Coast Air Quality
Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Dear Ms. Stevens:

Thank you for the opportunity to review the notice of completion for the Proposed Mobil California Air Resources Board (CARB) Phase 3 Reformulated Gasoline Project. We are very interested in keeping current on the progress of this project, receiving notices of public hearings and any other pertinent information as it becomes available.

5-1

Sincerely,

A handwritten signature in cursive script that reads "Chris Becker".

Chris Becker
Director of Public Works

Response to Comment from the City of Placentia
Correspondence dated July 20, 2001

- 5-1 The SCAQMD will ensure that the City of Placentia continues to receive any and all information regarding the status of the EIR process for the Mobil CARB Phase 3 Reformulated Gasoline Project. In addition, once the final EIR document has been certified, the SCAQMD will forward a copy of the Notice of Determination to the City of Placentia.



South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • <http://www.aqmd.gov>

September 5, 2001

City of Anaheim
Planning Department
P.O. Box 3222
Anaheim, CA 92803

Subject: Mobil CARB Phase 3 Reformulated Gasoline DEIR

The South Coast Air Quality Management District (SCAQMD) received your letter dated July 24, 2001 regarding the above referenced project. Thank you for reviewing and providing comments on the Draft Environmental Impact Report (DEIR). Pursuant to California Public Resources Code §21092.5, a copy of your comment letter and a response are enclosed. The Final EIR is expected to be certified by the SCAQMD Executive Officer by the end of September 2001.

If you have any questions, please feel free to contact me at (909) 396-3054, or Kathy C. Stevens at (909) 396-3439.

Sincerely,

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



CITY OF ANAHEIM, CALIFORNIA

Planning Department

July 24, 2001

FAXED & U.S. MAIL

Kathy C. Stevens
c/o Planning/CEQA
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, CA 91765-4182

Re: Draft EIR for the "Proposed Mobil California Air Resources Board (CARB) Phase 3 - Reformulated Gasoline Project"

Dear Ms. Stevens:

Thank you for the opportunity to review and comment on the above-referenced document. City of Anaheim staff offer the following comments:

1. **Zoning Requirements** – As indicated in the Draft EIR, the proposed modifications (new truck rack, off-loading areas, storage tank, drainage system, etc.) to the existing Atwood Terminal at 1477 Jefferson Street will require a Conditional Use Permit (CUP) from the City of Anaheim. Should you have any questions about the CUP process, please contact Greg McCafferty, Principal Planner, at (714) 765-5139, Extension 5743. 6-1

2. **Public Utilities Department, Environmental Services** – The City of Anaheim Public Utilities Department, Environmental Services, requests the following issues be addressed: 6-2
 - a) The Draft EIR does not adequately discuss or provide mitigation for potential impacts to groundwater quality near the Atwood Terminal. This terminal is located within the primary recharge area for Orange County's groundwater basin. The project site is less than one-half mile up-gradient from the Anaheim Lake recharge basin and several of Anaheim's municipal supply wells. Due to the location of the site, it is recommended the project include mitigation measures such as groundwater and vadose zone monitoring wells.
 - b) The Draft EIR does not adequately discuss the potential dangers associated with the railroad crossings near the Atwood Terminal. It is recommended that the EIR address/require truck routes that minimize railroad crossings to minimize potential

train collisions associated with the crossings and to address traffic that accumulates while trains are passing.

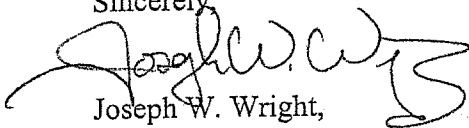
- c) The Draft EIR does not appear to adequately address the significant air emissions from the Atwood Terminal. Current VOC emissions far exceed the AQMD thresholds of significance and the project will increase operational emissions. However, the EIR concludes that cumulative emissions are not significant. It is recommended that, at a minimum, Mobil reduce the VOC emissions from the entire facility in order to offset any new emissions resulting from the project. The EIR should adequately analyze and address said air emissions.
- d) The Draft EIR does not address aesthetics. Since the proposed project will decrease the aesthetic quality of an already blighted area, it is recommended that Mobil include a treeline along the northern property line at the Atwood Terminal.
- e) The Draft EIR states on page 3-56 that, according to the City of Anaheim, a chlorinated solvent plume is being remediated in the vicinity of the Atwood Terminal. In order to allow verification of this assertion, the EIR should provide specific information on any known groundwater contamination in the area, including its location, responsible party, substance(s) involved and current status.

6-2
(contd)

Should you have any questions regarding the above comments, please contact Dick Wilson, Acting Environmental Services Manager, at (714) 765-4277.

Again, thank you for the opportunity to review and comment on this Draft EIR. Please forward any subsequent public notices and/or environmental documents regarding this project to my attention at the address listed on the first page of this letter. If you have any questions regarding this response, please do not hesitate to contact me at (714) 765-5139, Extension 5750.

Sincerely,



Joseph W. Wright,
Associate Planner

cc: Greg Hastings, Planning
Greg McCafferty, Planning
Dick Wilson, Util.-Envir. Serv.
Mark Komoto, PW-Design

**Responses to Comments from the City of Anaheim
Correspondence dated July 24, 2001**

- 2-1 The SCAQMD is aware that the proposed modifications to the Mobil Atwood Terminal are subject to the City of Anaheim Conditional Use Permit requirements. Mobil is complying with these requirements through the City's established land use permitting process.
- 2-2 a.) The Draft EIR does not fail to provide mitigation for potential impacts to groundwater quality near the Atwood terminal. Mitigation was not required as no potential significant adverse impacts to groundwater quality were identified. Further, the existing Atwood terminal currently has leak detection systems and leak alarms to allow rapid detection of a release, and established spill response procedures to respond quickly and effectively.
- b.) The Draft EIR does not fail to adequately discuss the transportation/traffic issues associated with the proposed project. Section 4.10 of the Draft EIR discusses transportation and traffic issues associated with the modification of the Atwood terminal. The proposed project is estimated to require approximately eight additional truck trips per day. Other existing terminal operations (e.g., transportation/traffic) will not be affected by the proposed project. Trucks transporting ethanol will comply with all Department of Transportation regulations, including those safety requirements while crossing railroads. The Draft EIR concludes that the proposed project would not create significant adverse transportation/traffic impacts. In addition, the Atwood facility/Mobil has no jurisdiction over the control of traffic that accumulates while trains are passing on the adjacent railroad.
- c.) The Draft EIR adequately addresses air quality issues at the Atwood terminal. The Draft EIR estimated project-related VOC emissions from the Atwood Terminal (15.5 lbs/day) to be well below the SCAQMD's established significance threshold of 55 lbs/day. The Draft EIR addresses air quality issues in Chapter 4, Section 4.1; and the SCAQMD believes the analysis is adequate.
- Cumulative impacts from the project are addressed in Chapter 6. As defined in §15355 of the CEQA Guidelines, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR.
- d.) The proposed modification to the existing Atwood terminal in accordance with the regulatory requirements of the CARB Phase 3 project were addressed in an Initial Study circulated for public review in August/September 2000. At that time, aesthetics were not identified as a potential significant adverse impact due to the fact that the Atwood Terminal is an existing facility within an industrial

setting. No comment letters were received that disputed this conclusion. Since modifications at the Atwood terminal will occur completely within the confines of the terminal, the proposed project would not be expected to contribute to the blight of the area. No mitigation measures are required, as the SCAQMD previously concluded that the proposed project would not create significant adverse aesthetic impacts.

e). According to Roy Herndon, Manager of the Hydrogeology Department at the Orange County Water District (the county's groundwater management agency), the nearest chlorinated solvent plume in the area of the Atwood Terminal is located approximately four miles away in a westerly direction, north of the 91 freeway, in Fullerton. There is no relationship between this site and the Atwood Terminal. The Draft EIR provided this groundwater remediation discussion as background information only, and to provide a more complete picture of existing groundwater contamination in the vicinity of the terminal.