

FINAL ENVIRONMENTAL IMPACT REPORT
TOSCO LOS ANGELES REFINERY, WILMINGTON PLANT
CARB PHASE 3 PROPOSED PROJECT

RESPONSE TO COMMENTS

INTRODUCTION

This Appendix has been added to the Final Environmental Impact Report (Final EIR) for the proposed Tosco CARB Phase 3 Reformulated Fuels Project to include the comment letters and responses to comments received on the Draft EIR.

The Initial Study, Notice of Preparation (NOP) of a DEIR, and the DEIR were circulated for public review and were otherwise available at the South Coast Air Quality Management District, 21865 E. Copley Drive, Diamond Bar, California 91765-4182 or by phone at (909) 396-3600. Portions of the DEIR can also be downloaded by contacting the SCAQMD's CEQA web pages at <http://www.aqmd.gov/ceqa/nonaqmd.html>.

The DEIR for the proposed project was released on January 16, 2001 for a 45-day public review and comment period. The DEIR contained responses to all comments received on the NOP. In addition, the DEIR contained a detailed project description, the environmental setting for each environmental resource where the NOP determined there was a potential significant impact, an analysis of the potentially significant environmental impacts, including cumulative impacts, project alternatives, and other areas of discussion as required by CEQA. The discussion of environmental impacts included a detailed analysis of air quality, geology/soil, hazards and hazardous materials, noise, and transportation/traffic.

The SCAQMD received one comment letter on the Draft EIR during the public comment period. The one comment letter was from the City of Los Angeles Fire Department. The responses to that comment letter are presented in this Appendix.

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

January 23, 2001

TO: Steve Smith
SCAQMD Headquarters
21865 E. Copley Drive
Diamond Bar, CA 91765

FROM: Fire Department

SUBJECT: **TOSCO LOS ANGELES REFINERY, WILMINGTON PLANT,
CARB PHASE 3 PROPOSED PROJECT**

PROJECT LOCATION

The Tosco Los Angeles Refinery, Wilmington Plant is located at 1660 West Anaheim Boulevard, Wilmington, California.

PROJECT DESCRIPTION

Description of Nature, Purpose, and Beneficiaries of Project: Tosco is proposing modifications to its existing Wilmington Plant in order to comply with the CARB Reformulated Gasoline Phase 3 requirements and produce adequate quantities of products. The primary objective of the modifications is to produce more alkylate which is required to meet the Reid vapor pressure standard as well as the more stringent benzene and sulfur standards.

1-1

The following comments are furnished in response to your request for this Department to review the proposed development:

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in Los Density Residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing.

- 1-2
- B. Firefighting Access, Apparatus, and Personnel.**
- At least two different ingress/egress roads for each area, which will accommodate major fire apparatus and provide for major evacuation during emergency situations, shall be required.
- Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.
- Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the Fire Department.
- 1-3
- Businesses that intend to handle hazardous materials may have to participate in the Unified Hazardous Waste and Hazardous Materials Management Program (Unified Program). Businesses are required to register with the Fire Department and complete a hazardous materials inventory if they handle hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases; or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR parts 30, 40 or 70. Businesses that operate underground storage tanks must apply for permits to install, modify, abandon or operate those tanks. Businesses that generate, treat, recycle or otherwise handle hazardous waste must register with the Unified Program Agency and receive a permit for these activities.
- 1-4
- Businesses that intend to handle regulated substances (previously called extremely hazardous substances) which are listed in Section 2770.5 of the California Code of Regulations (CCR) Title 19, Division 2, Chapter 4.5 may be required to participate in the California Accidental Release prevention Program (CalARP). These businesses shall notify the Fire Department's Unified Program Agency in writing of their inclusion into the program.
- Risk Management Plans involve all administrative and operational procedures of a business which are designed to prevent the accident risk of regulated substances, including, but not limited to programs which include design safety of new and existing equipment, standard operating procedures, preventative maintenance programs, operator training and accident investigation procedures, risk assessment for unit operations or operating alternatives, emergency response planning, and internal or external audit procedures to ensure that these programs are being executed as planned. Refer to CCR Title 19, Division 2, Chapter 4.5 and Federal regulations 40 CFR Part 68: "Chemical

1-4
cont.

Accidental Prevention Provisions" for further information and requirements regarding this program. If a business is required to submit a Risk Management Plan, the plan shall be submitted to the Fire Department prior to the facility beginning operation.

For additional information regarding the Unified Program, please contact the Technical Section of the Fire Department at (213) 485-8080.

1-5

Development of the project will expose additional people to local fire hazards. The City of Los Angeles Fire Department considers the existing fire fighting facilities in the vicinity inadequate to protect the site. The Fire Department also believes that the single access route to the site as proposed presents a potential adverse impact.

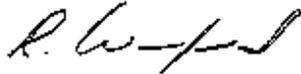
Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708).

For additional information, please contact Inspector Kevin Hamilton of the Construction Services Unit at (213) 485-5964.

WILLIAM R. BAMATTRE
Fire Chief



Richard A. Warford, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

RAW:KH:gm
c: Tosco LA Refinery

LETTER FROM CITY OF LOS ANGELES FIRE DEPARTMENT

Fire Department
January 23, 2001

Response 1-1

The comment primarily provides information regarding the Fire Department requirements and there are no specific comments on the proposed project. The existing Tosco Refinery Wilmington Plant (Wilmington Plant) currently meets the fire-flow requirements of the City Fire Department and no changes or modifications will be required for the purposed project.

Response 1-2

As required, the Wilmington Plant has more than two ingress/egress roads for each area that provide adequate clearance for major fire apparatus and can be used for evacuation during emergency situations, if necessary. At least eight gates are located at the Plant that provide ingress/egress to the site. These gates have been used by Tosco and the Fire Department during training exercises and have provided adequate clearance to move fire-fighting equipment into and out of the Plant.

The Wilmington Plant also has on-site fire hydrants that have been approved by the Fire Department. New fire hydrants will be required to comply with fire codes in the area of the Alkylolation Unit. The new fire hydrants will conform to the requirements of the Fire Department and be compatible with Fire Department equipment. Private streets and entry gates have been built to City standards and no changes to these are required as part of the proposed project.

Response 1-3

Tosco has and will continue to participate in the Unified Hazardous Waste and Hazardous Materials Management Program and has submitted the required information to the Fire Department under this program for the existing Refinery. Tosco does not expect to store additional materials as part of the proposed project that have not been previously reported to the Fire Department under this program. All changes due to the proposed project will be evaluated and required modifications to the Program, if any, will be forwarded to the Fire Department.

Response 1-4

The Wilmington Plant is an existing operating refinery and has submitted a Risk Management Plan to the Fire Department under the CalARP requirements. The proposed project is not expected to store any additional regulated substances or additional

quantities of regulated substances. Therefore, the proposed project is not expected to require changes to the Risk Management Plan (RMP). All changes due to the proposed project will be continuously evaluated and required modifications to the RMP, if any, will be forwarded to the Fire Department.

Response 1-5

The proposed project will not expose additional people to local fire hazards. All components of the project were analyzed in the document, including flash fires, explosions, toxic vapor clouds and radiation. The complete hazard analysis can be found in Volume III of the Draft EIR. The project will not increase the amount of crude throughput or gasoline production, and there will not be an increase in the intensity of a potential hazard. The project will not be located any closer to existing commercial, industrial, or residential areas than the existing refining structures. A hazard analysis was completed for the proposed modifications during the operational phase (see Volume I pages 4-27 through 4-36). This analysis evaluated the existing hazards at the Wilmington Plant and compared those to the hazards following completion of the proposed project. It was determined that the proposed Plant modifications and additions would not result in substantially larger potential hazard zones on-site as well as off-site than those posed by the existing Plant configuration. This result is primarily due to the nature of many of the modifications. The hazard analysis concluded that the proposed project would not result in any fire hazard that would extend off-site for the following reasons.

- Slight modification of a unit such that the vessel generating the largest potential hazard is unchanged (e.g., Butamer).
- Addition of equivalent equipment such that the potential hazards added are the same as those which already existing (e.g., railcar and truck loading).
- Exchanging products of equivalent hazard in storage (e.g., for the atmospheric storage tanks the hazards associated with atmospheric storage of liquid hydrocarbons are basically equal and do not extend off-site).

Therefore, the EIR concluded that there would be no significant impacts.

The City Fire Department was contacted to provide clarification regarding the comment related to inadequate fire fighting facilities in the vicinity. The City Fire Department considers its own existing fire-fighting facilities in the vicinity to be inadequate. That assessment is associated with the baseline or existing conditions of the area surrounding the Wilmington Plant and not the proposed project itself. The Wilmington Plant will continue to voluntarily maintain and operate its own on-site fire department, which augments the City of Los Angeles Fire Department when responding to emergencies at the refinery. The Wilmington Plant maintains a fully-trained 24-hour emergency response team; maintains fire-fighting equipment, including fire engines and foam pumping trucks or trailers; and maintains manual and automatic fire suppression systems for flammable and combustible materials. Tosco staff provides first response in the event

of an emergency and is backed up by the City Fire Department, as needed. Wilmington Plant staff trains with the City Fire Department, by conducting on-site fire training exercises with the City Fire Department staff annually. The proposed project will not increase the requirements for additional or altered fire protection.

There is not a single access route into the Wilmington Plant. It currently maintains multiple fire access routes (at least eight gates) into the site and the proposed project will not alter the existing access routes. Multiple fire access routes will continue to be maintained at the site.

The facility is in compliance with current applicable requirements. The Wilmington Plant currently maintains adequate fire lane access within the Plant and no modifications to fire lanes are expected as part of the proposed project. Tosco conducts fire-training exercises with its on-site fire department and with the City Fire Department as well. The City Fire Department has not indicated a problem with access. The fire drills have demonstrated that fire lanes provide adequate width so that fire equipment can be moved into the appropriate Plant locations. The Plant also has procedures to assure that adequate lane width is maintained including prohibition of parking in certain areas and the requirement that keys be left in vehicles parked in certain areas.

Response 1-6

The proposed project will comply with all applicable state and local fire codes, ordinances, laws, etc., including applicable Fire Protection and Fire Prevention Plan requirements. The facility is expected to work with the City Fire Department to ensure all applicable regulations and codes are adhered to.

March 7, 2001

Richard A. Warford
Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety
City of Los Angeles, Fire Department
200 N. Main Street, Room 920
Los Angeles, California 90012

VIA FACSIMILE (213) 847-3441

Dear Mr. Warford:

Draft Environmental Impact Report (EIR) for the Tosco Los Angeles Refinery
Wilmington Plant CARB Phase 3 Proposed Project (SCH 2000091056)

The South Coast Air Quality Management District (AQMD) received your comment letter regarding the above referenced project. Thank you for reviewing and providing comments on the Draft Environmental Impact Report (EIR) for the Tosco Los Angeles Refinery Wilmington Plant CARB Phase 3 Proposed Project. A copy of your comment letter and a draft response are enclosed.

The Final EIR, which also will include the responses to your comments, will be sent to you upon certification. The Final EIR is expected to be considered for certification this month. If you have any questions or need other information on the environmental analysis for this project, please call me at (909) 396-2706.

Sincerely,

Michael A. Krause
Air Quality Specialist
CEQA Section

Enclosure