



City of El Segundo

October 27, 2005

Via Facsimile & U.S. Mail

Elected Officials:

Kelly McDowell,
Mayor
John G. Gaines,
Mayor Pro Tem
Jim Boulgarides,
Council Member
Eric K. Busch,
Council Member
Carl Jacobson,
Council Member
Cindy Mortesen,
City Clerk
Ralph Lanphere,
City Treasurer

Appointed Officials:

Jeffrey Stewart,
City Manager
Mark D. Hensley,
City Attorney

Department Directors:

Bret Plumlee,
Administrative Services
Norm Angelo,
Fire Chief
Debra Brighton,
Library & Cable Services
Seimone Jurjic,
Planning and Building
Safety
Jack Wayt,
Police Chief
Steven Finton,
Public Works
Stacia Mancini,
Recreation & Parks

www.elsegundo.org

Michael A. Krause
Air Quality Specialist, CEQA Section
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

**RE: CHEVRON PRODUCTS REFINERY
EL SEGUNDO HEAVY CRUDE PROJECT – NOTICE OF PREPARATION**

Dear Mr. Krause:

The City of El Segundo has had an opportunity to review the Initial Study for the above-noted project. Following are our comments:

1-1

- **Public Noticing:** The NOP indicated that the public notice was published in the Los Angeles Times and the Daily Breeze. Please note that the El Segundo Herald is the City's adjudicated newspaper and the City requests that any future public notices (i.e., Draft EIR, etc.) be published in this newspaper.

1-2

- **Mailing List:** The AQMD mailing list does not contain a notification contact for the City of Manhattan Beach. Since this City's jurisdictional boundary is contiguous to the south property line for Chevron (south of Rosecrans Avenue), please add the following to your mailing list: Richard Thompson, Director of Community Development, City of Manhattan Beach, 1400 Highland Avenue, Manhattan Beach, CA 90266.

1-3

- **References:** No City of El Segundo documents were listed in the References section. Please refer to the following documents when reviewing these sections:

1-4

➤ **Geology and Soils:** City of El Segundo, General Plan – Public Safety Element (1992);

1-5

➤ **Traffic/Transportation:** City of El Segundo, General Plan – Circulation Element (2004) – for discussion of minimum acceptable Levels of Service (LOS); City of El Segundo, Municipal Code, Chapter 15-15-3 (Parking Regulations) – for discussion of minimum parking requirements; also, wasn't there a Draft Traffic Study prepared by a consultant? If so, please cite this document.

1-6

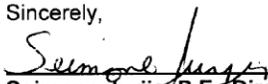
➤ **Cultural Resources:** Conejo Archaeological Consultants, Archaeological and Historical Records Search Results for the Chevron El Segundo Refinery (September 2005);

Planning and Building Safety Department
350 Main Street, El Segundo, California 90245-3813
Phone (310) 524-2300 FAX (310) 322-4167

- **Land Use and Planning/ Aesthetics:** City of El Segundo, General Plan – Land Use Element (1992); City of El Segundo, Municipal Code, Chapter 15 (Zoning Regulations); and
- **Noise:** City of El Segundo, Municipal Code, Chapter 7-2 (Noise Regulations).
- **Aesthetics:** Please provide greater clarification between existing and new structures in answers to Sections A,B and C. With respect to Section D, regarding light sources, clarification should be given regarding any additional light impacts for the taller fractionators that are proposed for installation (proposed main fractionator is 170 feet as opposed to 118 feet). Also, if light sources will be located higher than the existing 118-foot tall fractionator, the impact may be potentially significant rather than less than significant.
- **Hazardous Materials:** The Initial Study checklist indicated that there would be “No Impact” to Sections A through E. We disagree that the scope of work proposed will not have any impacts whatsoever on hazardous materials, given the industrial nature of the project activities. Given that the Project Description describes 20 additional daily truck trips transporting petroleum coke to the Port of Los Angeles, this activity does not warrant a No Impact on Section A. Similarly, the potential for accidental release of hazardous material in Section B and the materials' location on a listed site containing hazardous materials in Section D should be determined to be at a minimum, Less Than Significant. While there may not be a school within a precise ¼-mile radius of the site, there is at least one primary school within two-blocks of the project site. Accordingly, we feel that Section C merits at least a Less Than Significant Impact. Finally, the project is located within two miles of Los Angeles International Airport and do not agree that there will be no impacts whatsoever to potential safety hazards related to people residing and working in the project area. Though the 170-foot height of the fractionator may well be under FAA regulations, it should be deemed at a minimum, Less Than Significant.
- **Public Services:** The Initial Study checklist indicated that there would be “No Impact” to Public Services. City staff requests that this be changed to “Less Than Significant Impact” because we are not entirely convinced that the new development at Chevron will not have any impacts whatsoever.

City staff would like to meet with you during the administrative draft phase of the EIR to discuss the project's impacts and other issues of concern to ensure a seamless process. Please schedule a meeting during the administrative draft EIR process through Ava Pecherzewski, Senior Planner, at 310.524.2342, or Kimberly Christensen, Planning Manager, at 310.524.2340.

Sincerely,



 Seimone Jurjjs, P.E., Director
 Department of Planning & Building Safety

c: Steve Smith, Ph.D., CEQA Section Program Supervisor, AQMD

Response to Comments from City of El Segundo Correspondence
Dated October 27, 2005

- 1-1 As requested in the comment, future public notices regarding the Chevron Heavy Crude Project will also be published in the El Segundo Herald.
- 1-2 As requested in the comment, Richard Thomson, Director of Community Development of the City of Manhattan Beach will be included in the mailing list for notices regarding the Chevron Heavy Crude Project.
- 1-3 Please see the responses to comments 1-4 through 1-8.
- 1-4 The comment is correct that the City of El Segundo, General Plan - Public Safety Element was not listed in the References Section of the Initial Study. The Public Safety Element includes Goals PS1: Geology and Soils to “protect the public health and safety and minimize the social and economic impacts associated with geologic hazards,” and Goal PS2: Faulting and Seismicity/Structural Hazards to “minimize injury and loss of life, property damage, and social, cultural and economic impacts caused by earthquake hazards.” The Public Safety Element includes a number of policies and programs to implement these goals. These programs require review of building and developmental plans by the City of El Segundo to ensure that they are consistent with the policies that implement Goals PS1 and PS2. As stated on page 1-2 in Chapter 1 of the Initial Study, the City of El Segundo will act as the responsible agency for permits and approvals required by the City. Therefore, although the Public Safety Element of the City of El Segundo General Plan was not specifically cited in the Initial Study, the proposed project will comply with the requirements of this element through the issuance of permits and approvals by the City.
- 1-5 The Initial Study concluded in Section XVII of Chapter 2 that the traffic impacts associated with the increased automobile and truck traffic volumes associated with the proposed project were potentially significant and would be evaluated in the Draft EIR. Because these potential impacts were not analyzed in the Initial Study, the Initial Study did not present impacts to Level of Service (LOS) that would be considered significant adverse impacts. Significance criteria are presented in Section 4.6 of the Draft EIR, and references to the Circulation Element of the City of El Segundo General Plan and to Chapter 15-15-3 of the Municipal Code are included.
- 1-6 The Archaeological and Historical Records Search Results for the Chevron El Segundo Refinery prepared by Conejo Archaeological Consultants was not included in the References section of the Initial Study. However, this report was included as Appendix A of the Initial Study.

- 1-7 The Land Use Element of the City of El Segundo General Plan was cited in X.b) of Chapter 2 of the Initial Study, although it was not listed in the References section. City of El Segundo, Municipal Code, Chapter 15 (Zoning Regulations) was not cited in the Initial Study. However, the Initial Study indicated in X.b) of Chapter 2 that the refinery site is zoned by the City of El Segundo as Heavy Industrial (M-2) and that the proposed project would not require zoning or land use changes.
- 1-8 The Initial Study concluded in Section XII of Chapter 2 that the noise impacts associated with the proposed project were potentially significant and would be addressed in the Draft EIR. Because these potential impacts were not analyzed in the Initial Study, the Initial Study did not discuss the requirements of the City of El Segundo Municipal Code, Chapter 7-2 (Noise Regulations). These requirements are discussed in Sections 3.4 and 4.4 of the Draft EIR.
- The requirement of Section 15-6B-7C (incorrectly cited as Section 15-6B-7B) of the El Segundo Municipal Code that structures located in the Heavy Industrial (M-2) Zone be no more than 200 feet tall was cited in I.a), b) &c), Aesthetics, of Chapter 2 of the Initial Study, although the citation was not included in the References section of the Initial Study.
- 1-9 The proposed new Coker Main Fractionator column is the only proposed new structure discussed in Section I.a), b) & c) of Chapter 2 of the Initial Study. The other structures listed, including the drilling structures on top of the coke drums, the Fluid Catalytic Cracking (FCC) Unit Reactor, the Atmospheric Distillation Column and Furnace Stacks at the No. 4 Crude Unit, and the Continuous Catalytic Reformer process plant are existing structures.
- 1-10 Additional permanent lighting will be installed on the proposed new Coker Main Fractionator column. This new lighting will be consistent in intensity and type with the existing lighting on equipment and other refinery structures that are being replaced or modified. The existing Main Fractionator, as well as other equipment throughout the facility, is currently illuminated at night for safety and security purposes. Although the proposed new Main Fractionator column will be approximately 170 feet tall, which is 52 feet taller than the 118-foot tall existing Coker Main Fractionator column that will be replaced, it is located in the middle of the refinery property. Additionally, as discussed in I.a), b) and c) of Chapter 2 of the Initial Study, there are several existing structures in the vicinity of the proposed new Main Fractionator column that are taller than the proposed new Main Fractionator column, including the drilling structures on top of the coke drums and the Fluid Catalytic Cracking (FCC) Unit Reactor. These existing structures have lights installed throughout their height to provide nighttime lighting. Thus, no new areas would be illuminated on-site or off-site by permanent additional lighting. Therefore, the proposed project is not expected to create substantial new sources of light or glare which would adversely affect day

or nighttime views in the area, as concluded in the Initial Study, and potential adverse impacts to aesthetics will be less than significant.

- 1-11 As discussed in VIII.a) & b) of Chapter 2 of the Initial Study, the Chevron El Segundo Refinery currently stores, uses and transports hazardous materials. The proposed project as described in Chapter 1, Project Description, of the Initial Study would not substantially change the quantities of non-flammable hazardous materials, as regulated under the Federal Risk Management Program or the California Accidental Release Program, or the manner in which they are stored, used or transported. However, proposed modifications to the refinery's No. 6 H₂S Plant were added to the proposed project subsequent to release of the Initial Study. These additional proposed modifications are described in Chapter 2, Project Description, of the Draft EIR. As discussed in Chapter 2 of the Draft EIR, these modifications include construction of a new Diethenanolamine (DEA) Regenerator, which will produce acid gas containing hydrogen sulfide (H₂S). Hydrogen sulfide is a non-flammable hazardous substance, and potential hazards associated with the proposed new DEA Regenerator are analyzed in Section 4.2 of the Draft EIR.
- 1-12 As stated in the comment, the proposed project will potentially generate 20 additional truck trips per day to export petroleum coke from the refinery to the Port of Los Angeles or the Port of Long Beach. Additionally, the proposed project will also generate two additional truck trips per day to export sulfur from the Refinery to chemical manufacturing facilities in the vicinity of the Port of Los Angeles. However, neither petroleum coke nor sulfur are regulated as hazardous materials under the Federal Risk Management Program or the California Accidental Release Program. Therefore, the additional truck trips to transport petroleum coke and sulfur do not create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials.
- 1-13 The list of sites compiled pursuant to Government Code §65962.5, referred to in VIII.d) of the Initial Study, refers to sites with contamination by hazardous materials or that have the potential to release hazardous wastes. It does not refer to facilities that use or store hazardous materials, as implied in the comment. The activities related to the proposed project are not expected to significantly impact the remediation activities currently being undertaken as a result of the refinery being listed as hazardous materials sites pursuant to Government Code §65962.5. Therefore, potential impacts under VIII.d) would be less than significant, rather than "No Impact," as indicated in the Initial Study. Since these potential impacts will be less than significant, they were not analyzed further in the Draft EIR.
- 1-14 Saint Anthony School is located at 233 Lomita Street in El Segundo, within two blocks of the El Segundo refinery. Although this school is not within one-quarter

mile of the proposed modifications, potential adverse impacts in VIII.d) of the Initial Study should be considered less than significant, rather than “No Impact,” as indicated in the Initial Study.

- 1-15 As stated in VIII.e) & f) of the Initial Study, The proposed project is located within two miles of Los Angeles International Airport. However, the modifications to the facilities required for the proposed project are comparable to existing facilities and would not increase safety hazards for people residing or working in the proposed project area. The height of the proposed new Coker Main Fractionator column will not exceed the 200-foot height threshold that would require Federal Aviation Administration notification, as specified in 14 CFR §17.13(a). However, because the proposed project includes the construction of new structures, it would be appropriate to conclude that the potential impacts are less than significant, rather than “No Impact,” as indicated in the Initial Study. Since these potential impacts will be less than significant, they were not analyzed further in the Draft EIR.
- 1-16 As stated in XIV.a) in Chapter 2 of the Initial Study, the Chevron El Segundo Refinery is served by the City of El Segundo Fire Department, which maintains two fire stations within the city, as well as by the refinery’s internal fire department. The proposed project during both construction and operation will not substantially change the load on the refinery’s fire fighting and emergency response resources and would not be expected to create the need for additional fire protection services or resources by Chevron or the City of El Segundo. However, it would be appropriate to conclude that the potential impacts are less than significant, rather than “No Impact,” as indicated in the Initial Study. Since these potential impacts will be less than significant, they were not analyzed further in the Draft EIR.
- 1-17 The SCAQMD staff met with representatives of the City of El Segundo during the CEQA scoping session on October 20, 2005 and discussed the issues raised in the comment letter. In March 2006, the SCAQMD staff contacted the City of El Segundo regarding their comment letter and sent the responses to the comments for their review in advance of the release of the Draft EIR to the public. A follow-up call was made inquiring about the adequacy of the responses and the necessity of another meeting. No response from the City of El Segundo was received, so a meeting prior to the release of the Draft EIR was deemed not necessary or warranted.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF REGIONAL PLANNING
IGR/CEQA BRANCH
100 SOUTH MAIN STREET
LOS ANGELES, CA 90012
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FAX (213) 897-1337



*Flex your power!
Be energy efficient!*

November 4, 2005

Mr. Michael A. Krause
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765

Re: *Chevron – El Segundo Refinery Heavy Crude Project*
Notice of Preparation of an EIR
IGR/CEQA No. 050963/EA, SCH # 2005091152
Vic. LA-1-PM 23.9-24.9, LA-105-PM R0.00-R0.05

Dear Mr. Krause:

We acknowledge receipt of the notice that an Environmental Impact Report is to be prepared for a project to modify the Chevron oil refinery so that it can process heavier crude oil. The refinery is located at 324 West El Segundo Boulevard adjacent to Sepulveda Boulevard in the City of El Segundo.

- 2-1 [We note that construction of the proposed project will generate additional traffic from construction personnel as well as from transportation of construction materials and equipment to the refinery. The additional traffic volumes would potentially result in increase congestion at intersections or increase the volume to capacity ratio on roadways in the project vicinity. We request that construction-related truck
- 2-2 [trips expected to use State Route 1, 105, or 405 be limited to off-peak commute periods as much as possible. Generally during weekdays, peak commuting periods occur from 6:00 – 9:00 AM and from 4:00 to 7:00 PM.

If you have any questions regarding our response, you may call me at (213) 897 – 3747 and refer to our internal record number 050963/EA.

Sincerely,

Handwritten signature of Cheryl J. Powell in cursive.

CHERYL J. POWELL
IGR/CEQA Program Manager
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

**Response to Comments from California Department of Transportation Correspondence
Dated November 4, 2005**

- 2-1 Potential impacts from increased traffic during construction of the proposed project were analyzed as presented in Section 4.5 of the Draft EIR.
- 2-2 As requested in this comment, construction-related truck traffic will be limited to off-peak periods as much as possible.