



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

July 31, 2015

Kristin Pollot
City of Pittsburg
Community Development Department—Planning Division
65 Civic Avenue
Pittsburg, CA 94565

Dear Ms. Pollot,

Bay Area Air Quality Management District (District) staff has reviewed the City of Pittsburg's (City's) Notice of Preparation (NOP) of a Second Recirculated Draft Environmental Impact Report (SRDEIR) prepared for the proposed modernization and reactivation of an existing oil storage and transfer facility. We understand the project will consist of 125 acres, which includes leasing 43 acres of submerged tideland from the City, improving the marine terminal, construction of new pipeline connections to the existing Chevron KLM and Kinder Morgan pipelines, and upgrading other ancillary equipment.

Previous Comments

District staff has commented on the proposed project on July 27, 2012, and on September 13, 2013. District staff suggests that the SRDEIR address all applicable comments made in the District's 2012 and 2013 comment letters, which are available at: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-comment-letters>.

As stated in prior comment letters, this project will require an Authority to Construct and a Permit to Operate issued by the District. The District has not yet received a permit application for review.

Additional Comments

Air District staff submits the following additional comments as a Responsible Agency under CEQA (§ 15096) regarding the recommended air quality and greenhouse gas (GHG) analysis to be provided in the SRDEIR.

- The Air District's *CEQA Air Quality Guidelines* provide recommendations on how to evaluate and mitigate a project's potential air quality impacts. You may download a copy from the Air District's website at http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/baaqmd-ceqa-guidelines_final_may-2012.pdf?la=en.
- Staff recommends a detailed analysis of the project's potential effects on local and regional air quality from construction, operations, and cumulative impacts for the project and each of the alternatives analyzed.

ALAMEDA COUNTY

Tom Bates
Margaret Fujioka
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY

John Gioia
David Hudson
Karen Mitchoff
Mark Ross

MARIN COUNTY

Katie Rice

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

John Avalos
Edwin M. Lee
Eric Mar
(Vice-Chair)

SAN MATEO COUNTY

David J. Canepa
Carole Groom
(Chair)

SANTA CLARA COUNTY

Cindy Chavez
Liz Kniss
(Secretary)
Jan Pepper
Rod G. Sinks

SOLANO COUNTY

James Spering

SONOMA COUNTY

Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

- Staff recommends including daily average and annual estimates of all criteria pollutants, toxic air contaminants (TACs), and GHG emissions from construction and operation of the project.
- Staff recommends the air quality analysis for marine vessel emissions utilize the California Air Resource Board's (CARB's) *Emissions Estimation Methodology for Commercial Harbor Craft Operating in California*, which provides a resource based on current fleet information, and is available at: <http://www.arb.ca.gov/msei/chc-appendix-b-emission-estimates-ver02-27-2012.pdf>. As stated in the 2012 comment letter, vessel emissions are recommended to be estimated from 11 nautical miles offshore at the Bar Pilot station to berth.
- Staff recommends preparation of a cumulative health risk assessment (HRA), including all sources, such as stationary, mobile, and marine, to evaluate potential health effects associated with the construction and operation of the proposed project. The District's *Recommended Methods for Screening and Modeling Local Risks and Hazards* provides detailed guidance on how to screen projects for potential risks and hazards impacts, and is available at: <http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/risk-modeling-approach-may-2012.pdf?la=en>. The preparers of the HRA are encouraged to contact Air District staff to discuss modeling parameters prior to conducting the modeling.
- Staff recommends a comprehensive analysis of mitigation measures, including those rejected and those recommended for implementation. Staff recommends consideration of the following feasible mitigation measures:
 - *Basic and Additional Construction Mitigation Measures* listed in Tables 8-1 and 8-2 of the District's *CEQA Air Quality Guidelines*.
 - Prohibit the use of diesel generators where access to the electrical grid is available.
 - Require electrification of motors, pumps, and other power tools whenever feasible.
 - Require the use of biodiesel or other alternative fuels in generators, construction equipment, and/or off-road vehicles.
 - Require all equipment to meet at least the US EPA Tier 4 Interim engine standards or use equipment fitted with diesel particulate filters where Tier 4 Interim engines are not available.

We encourage lead agencies to contact District staff with questions during the preparation of the air quality and greenhouse gas emissions analyses. If you have any questions regarding these comments, please contact Josh Pollak, Environmental Planner at 415-749-8435 or jpollak@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Board Member John Gioia
BAAQMD Board Member David Hudson
BAAQMD Board Member Karen Mitchoff
BAAQMD Board Member Mark Ross