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Connect with the
Bay Area Air District:



December 7, 2023

Joseph Lawlor, Project Planner
Community Development Division
Department of Conservation & Development
Contra Costa County
30 Muir Road, Martinez, CA 94553

Re: Phillips 66 Rodeo Renewed Project Draft Revised Environmental Impact Report

Dear Joseph Lawlor:

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Revised Environmental Impact Report (DREIR) for the Phillips 66 Rodeo Renewed Project (Project).

Project Description

The Project is located at 1380 San Pablo Avenue, in the community of Rodeo, in Contra Costa County (County). The Project site comprises approximately 1,100 acres of land and is named the Rodeo Refinery. The main components of the Project are located within a 495-acre developed area of the Rodeo Refinery, located northwest of Interstate 80 (I-80). This area is referred to as the Rodeo Site. The Project includes other changes to Phillips 66's facilities, both within the Rodeo Refinery and in San Luis Obispo County, as described below.

As part of the Project, the Rodeo Site will stop processing crude oil, but will receive, blend, and ship up to 40,000 barrels per day (bpd) of gasoline and gasoline blendstocks. In addition to gasoline, the Rodeo Site will blend renewable diesel, propane, naphtha, and potentially aviation fuel, for a total of up to 55,000 bpd. In addition, the Carbon Plant Site, located southeast of I-80 at 2101 Franklin Canyon Road in Rodeo and within the 1,100-acre Rodeo Refinery site, will cease to be used and will be demolished.

The Project includes changes to the Phillips 66 Santa Maria facility in San Luis Obispo County. The Santa Maria facility currently provides crude oil feedstocks to the Rodeo facility. The Project will idle and decommission the Santa Maria facility. The existing Phillips 66 crude oil pipeline network from the gathering fields in central California to the Rodeo facility will no longer be necessary to support the reconfigured facility and will be active, but out of service. To account for the idling of the Santa Maria facility and to maintain production levels during the transition process, the Project proposes to increase deliveries of crude oil across the Marine Terminal on a short-term and transitional basis.

Purpose of DREIR

The County has prepared the DREIR in response to the Superior Court's October 12, 2023, decision regarding the Project's 2022 Environmental Impact Report. On October 12, 2023,

the Superior Court directed the County to reconsider three issues and to conduct further environmental review in compliance with the California Environmental Quality Act (CEQA). DREIR Appendix A includes the Superior Court's Statement of Decision.

Air District's Previous Comment Letters

The Air District previously submitted a comment letter dated January 27, 2021, on the Project's Notice of Preparation for a Draft Environmental Impact Report (DEIR), released on December 21, 2020; and a comment letter dated December 17, 2021, on the Project's DEIR released in October 2021. Both letters are available on the Air District's [Comment Letters](#) webpage.

Air District's Comments on the DREIR

The Air District has the following comments on the Project's DREIR.

Odor Prevention and Management Plan

The Air District strongly encourages Phillips 66 to revise the Odor Prevention and Management Plan (OPMP), included in the DREIR as Appendix E, to include more information about how Phillips 66 will prevent and mitigate odors through best practices, inspections, good record keeping, and staff training. A well-documented OPMP will reassure community members that Phillips 66 is committed to being proactive and responsive to community concerns about odors. The OPMP should include:

1. A list of Best Management Practices Phillips 66 will implement, including, but not limited to commitments to:
 - a) Offload the feedstock as soon as it arrives at the site and disallow the overnight storing of feedstock in rail, truck, or other shipping containers;
 - b) Ensure that sludge from the Pre-treatment Unit will not be stored in trucks overnight;
 - c) Specified daily and/or weekly frequencies of conducting such practices; and
 - d) Include identification of Air District-assigned source number for applicable sources.
2. Documentation stating how Phillips 66 will:
 - a) Control marine unloading odors;
 - b) Ensure the carbon canister systems have permit conditions that specify monitoring, inspection, and changeout, and include the corresponding frequency of these activities;
 - c) Corrective actions and procedures to prevent repeating odor incidents;
 - d) Descriptions of renewable feedstock tanks, in addition to the description of Tank 100;
 - e) Description of the Facility's REOP-11-OPS EMERGENCY - Odor Complaint Investigation and CWS Notification Requirements procedure; and
 - f) Descriptions of the pre-job plans and procedures put in place for the safe flushing and cleaning of the equipment, vessel, piping, etc., prior to opening the system for maintenance work.
3. A detailed Administrative Section that includes:
 - a) A schedule of odor monitoring and inspections, including a frequency of odor inspections (i.e. daily, weekly);
 - b) Use of proper Air District protocol to determine the source of any odorous emissions;

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- c) Requirement to maintain, update, and operate the OPMP as reviewed and approved by Contra Costa County;
 - d) A record retention policy, including what records will be kept regarding odor events and where records are to be kept;
 - e) A description of the staff odor prevention and management training program, including how to identify the source of potential odor and respond to spillages; and
 - f) The name, title and contact information of the responsible individual(s) in the case of odor complaints.

In addition to the comments above, the Air District recommends that the County review and require implementation of best practices to center environmental justice, health, and equity in the construction and operations phases of this Project as illustrated in chapter two (2) of the Air District's 2022 California Environmental Quality Act (CEQA) Guidelines.¹

Thank you for the opportunity to provide comments on the DREIR. If you have any questions on these comments, please contact Alison Kirk, akirk@baaqmd.gov and Mark Tang, mtang@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Executive Officer of Science and Policy

Cc: BAAQMD Director John Gioia
BAAQMD Director David Hudson
BAAQMD Director Ken Carlson
BAAQMD Director Mark Ross

¹ Bay Area Air Quality Management District, 2022. [California Environmental Quality Act \(CEQA\) Guidelines](#), Chapter 2, Best Practices for Centering Environmental Justice, Health, and Equity