



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

July 10, 2014

Contra Costa County  
Department of Conservation & Development  
Community Development Division  
Attn: Gary Kupp  
30 Muir Road  
Martinez, CA 94553

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Proposed Shell Greenhouse Gas Reduction Project

Dear Mr. Kupp,

Bay Area Air Quality Management District (Air District) staff reviewed the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for the Proposed Shell Refinery (Refinery) Greenhouse Gas Reduction Project (Project). We understand that the Project proposes to permanently shut down the Refinery's Flexicoker Unit, thereby reducing greenhouse gas emissions by 15 percent and sulfur dioxide emissions by 25 percent. The Project also proposes installing new and reconfigured energy-efficient equipment and reconfiguring and modifying existing equipment in order to process lighter crude oil. The Project is not expected to increase the Refinery's total production or refining capacity.

The District has the following specific comments on the environmental analysis that should be included in the DEIR:

1. The DEIR should provide a detailed analysis of the Project's potential effects on local and regional air quality impacts. The Air District's *CEQA Air Quality Guidelines (May, 2012)* provide guidance on how to evaluate a project's construction, operational and cumulative air quality impacts. A copy may be downloaded from: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx>.
2. The DEIR should include a discussion on the Air District's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines; a discussion of the health effects of air pollution; and a discussion of greenhouse gas (GHG) emissions and the potential impacts from climate change in the Bay Area.

ALAMEDA COUNTY

Tom Bates  
Margaret Fujioka  
Scott Haggerty  
Nate Miley  
(Chair)

CONTRA COSTA COUNTY

John Gioia  
David Hudson  
Mary Piepho  
Mark Ross

MARIN COUNTY

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James Sperring

SONOMA COUNTY

Teresa Barrett  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

3. The DEIR should provide a map that clearly identifies the Project's boundary; existing and future planned sensitive receptors (e.g., residences, schools, day cares, hospitals, and nursing care facilities) and all stationary sources, highways, major roadways, marine terminals, and rail lines within half a mile of the Project's boundary.
4. Air District staff recommends using the CalEEMod land use emissions software for estimating transportation emissions. CalEEMod is available for free at [www.caleemod.com](http://www.caleemod.com).
5. The DEIR should estimate and evaluate the potential health risk to sensitive populations within the Project area from toxic air contaminants (TACs) and fine particulate matter (PM<sub>2.5</sub>) as a result of Project construction and operations including refinery processes, mobile, rail, and shipping emissions. The DEIR should evaluate potential cumulative health risks from the Project and refinery processes combined with impacts from stationary sources, highways, major roadways, marine terminals, and rail lines in proximity to the Project area.
6. The DEIR should identify and evaluate mitigation measures to reduce criteria pollutants, TACs, PM<sub>2.5</sub>, and GHGs to lessen any potential air quality impacts. The Air District's *CEQA Air Quality Guidelines* can assist in identifying and quantifying mitigation measures.
7. The DEIR should evaluate the Project's consistency with the Air District's *2010 Clean Air Plan*. The Air District's *2010 Clean Air Plan* may be found on the Air District's website, <http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans.aspx>.

The Air District has not yet received a permit application for the Project. Proposed equipment cannot be installed, modified, altered, operated, or tested without the required Air District permits. The Project applicant should contact the assigned Air District permit engineer, Nicholas Maiden, Air Quality Engineer, at [nmaiden@baaqmd.gov](mailto:nmaiden@baaqmd.gov) or at 415-749-4718, to discuss any equipment modifications/alterations or use of new equipment at the site that may require permits from the Air District. The analysis methodology used in the DEIR and all subsequent environmental documents for the proposed Project should be consistent with the Air District's permitting requirements.

The DEIR should include all appendices or technical documents related to the air quality, toxic air contaminant, and GHG analyses, such as emission calculation and health risk assessment files. Without all the supporting air quality documentation, Air District staff and the public may be unable to review the air quality analysis in a timely manner.

The Air District's website contains a number of tools and resources to assist lead agencies in analyzing environmental impacts, including: previous CEQA comment letters; guidance on quantifying plan level GHG emissions; and risk and hazard screening tools and guidance. View and download available tools here: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>.

We encourage lead agencies to contact Air District staff with any questions and/or to request assistance during the environmental analysis process. If you have any questions regarding these comments, please contact Sigalle Michael, Senior Environmental Planner, 415-749-4683.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director John Gioia  
BAAQMD Director David Hudson  
BAAQMD Director Mary Piepho  
BAAQMD Director Mark Ross