



September 13, 2016

Sarah Mongano
California State Lands Commission
100 Howe Ave, Suite 100-South
Sacramento, CA 95825

Subject: Chevron Long Wharf Maintenance and Efficiency Project Initial Study and Mitigated Negative Declaration (IS/MND)

Dear Ms. Mongano:

Bay Area Air Quality Management District (Air District) staff has reviewed the California State Lands Commission's IS/MND prepared for the Chevron Long Wharf Maintenance and Efficiency Project (Project). The proposed Project would allow Chevron Products Company to implement modifications to the Richmond Refinery Long Wharf (Long Wharf), including seismic retrofits to berths, adding mooring equipment, and installing piles and over water structures, in order to meet Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS) requirements and improve reliability.

The IS/MND did not identify if the Project would require an Authority to Construct/Permit to Operate (Permit) from the Air District and therefore if the Air District may be a Responsible Agency per the California Environmental Quality Act (CEQA). Air District staff recommends that the project proponent and the lead agency contact Air District staff as soon as possible to determine whether an Air District Permit is required. In addition, Air District staff recommends that the following information be provided in the IS/MND to determine if the Project will have significant air quality impacts.

Long Wharf Emissions Control Equipment

Currently, the Long Wharf contains a vapor recovery system and a Marine Loading Thermal Oxidizer (A-900). On page ES-3 and 2-7, the IS/MND mentions possible physical changes to the vapor recovery systems. Air District staff recommends that the IS/MND:

- Describe thoroughly any proposed substantive changes to the vapor recovery system and/or A-900.
- Identify if a Permit from the Air District will be required for alteration/modification of A-900 or any of the berths.
- Include a thorough description about how emissions from the Long Wharf are currently abated, and how emissions will be abated in the future.

Vessel Calls (ocean going vessels, tugs, and barges) and Operations

With respect to operations at the Long Wharf, the IS/MND states that vessel calls will remain within the ranges and fluctuations analyzed in the Chevron Modernization Project EIR and authorized by the Lease, and the Project would not result in changes in the number of vessel calls, or an increase or expansion of

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operations at the Long Wharf or Richmond Refinery. In order to evaluate the accuracy of the above statement, Air District staff recommends that the following information be provided in the IS/MND regarding vessel calls:

- The specific baseline period used for the IS/MND, and the actual number of vessel calls at each of the six berths at the Long Wharf, types of vessels, types of products loaded from the vessels to the Richmond Refinery and vice versa during the baseline period.
- Lease limits on vessel traffic, including specific annual/daily/other limits on the number of vessel calls, types of vessels, and types of products loaded from the vessel to the Richmond Refinery and vice versa.
- If efficiency at the Long Wharf would be improved by the project, the IS/MND should clarify that vessel calls will not increase as a result, and should substantiate how existing limits on vessel calls at the Long Wharf will not be exceeded.

Air District staff recommends that the IS/MND quantify and explain the assumptions and bases used to determine:

- Operational capacity of the Long Wharf.
- Crude oil, intermediates, and finished product offloading and loading and throughput rates (on a per Berth basis).
- Receipts of crude oil, intermediates, and volumes of finished products manufactured at and shipped off from the Refinery.
- Any specific permitted Title V and/or New Source Review limits.

Air District staff is available to assist California State Lands Commission staff in addressing these comments. If you have any questions, please contact Josh Pollak, Environmental Planner at 415-749-8435 or jpollak@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Executive Officer

cc: BAAQMD Secretary David E. Hudson
BAAQMD Director John Gioia
BAAQMD Director Karen Mitchoff
BAAQMD Director Mark Ross