



March 4, 2019

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Connect with the
Bay Area Air District:



Mr. Rob White
Planning & Development Services Director
City of Vallejo
555 Santa Clara Street
Vallejo, CA 94590

RE: Orcem/Vallejo Marine Terminal Project Draft Final Environmental Impact Report

Dear Mr. White:

Bay Area Air Quality Management District (Air District) staff has reviewed the City of Vallejo's Draft Final Environmental Impact Report (DFEIR) prepared for the Orcem/Vallejo Marine Terminal Project. The proposed project consists of a redevelopment of the former General Mills facility located at 790 and 800 Derr Avenue (at the western end of Lemon Street) in the southwestern portion of Vallejo. The Project involves two key elements: construction of the Orcem Plant (Orcem) and the Vallejo Marine Terminal (VMT). The Orcem element involves construction and operation of a cement processing facility to primarily produce ground granulated blast furnace slag to be used as an alternative to Portland Cement that will be distributed to various markets throughout Northern California via truck and rail. The VMT element consists of the construction and development of a deep-water terminal for the import of the raw materials that will be processed on site. According to the DFEIR, 760,000 metric tons of raw materials would be delivered to the Orcem Plant annually via a combination of ship, truck and rail.

The City of Vallejo was recently identified as a priority community that experiences high exposure to air pollution under the Air District's Community Health Protection Program (per AB 617). In addition, the Air District's Community Air Risk Evaluation (CARE) program identified Vallejo as a disproportionately impacted community approximately ten years ago due to the higher exposure and health burden within the community. Vallejo residents are exposed to higher levels of air pollution than other communities in the Bay Area. The intent of the Community Health Protection Program and CARE programs are to identify communities with higher air pollution levels and greater vulnerability, and to develop strategies to reduce the public's exposure to local sources of air pollution. The Project as proposed will increase air pollution in an already overburdened community and increase the health burden placed on the community from toxic air contaminants including diesel particulate matter, a known carcinogen.

The Air District has received a partial permit application for the Orcem segment of the Project; however, an application for the Vallejo Marine Terminal has not been received. For permitting purposes, the Air District will consider emissions associated with each portion of the overall Project when determining the Project's consistency with meeting new source review permitting requirements.

The Air District conducted a health risk assessment (HRA) for the stationary sources proposed for the Orcem portion of the Project. Based on the information provided to date, it appears that the project could not be permitted by the Air District unless additional pollution control equipment and/or process modifications were included. The potential increase in cancer risk from the stationary sources would require Orcem to install Best

Available Control Technology for Toxics (TBACT) on all sources of significant risk. As currently proposed without TBACT or the VMT application, the Air District would not be able to permit this Project.

The February 2017 Draft Final Environmental Impact Report (DFEIR) indicates that local air pollution impacts may not exceed the Air District's current significance thresholds. It should be noted, however, that we are in the process of updating these thresholds and anticipate that they will likely be more stringent in the near future. This is motivated by our concerns about localized health impacts in our most vulnerable communities, as noted above.

The DFEIR also identified significant safety impacts to pedestrians and bicyclists due to the substantial increase in daily truck trips generated by the Project (over 500 truck trips daily) that use local streets that will serve this Project (Lemon and Sonoma Boulevard). This substantial increase in heavy-duty truck traffic will discourage community members, including children and students of nearby schools, from using alternative modes of transportation, such as walking and cycling, due to safety concerns and exposure to diesel particulate matter. More can and should be done to protect pedestrians and cyclists from traffic hazards and exposure to diesel particulate matter. Walking and cycling are key components to healthy communities and are goals in the Air District's 2017 Clean Air Plan. As proposed, the Project will discourage these alternative modes of transportation.

We very much seek to work with community members and City staff on improving air quality and health in Vallejo; indeed, these efforts have already begun, and we look forward to continued engagement. If you have any questions regarding these comments, please contact Andrea Gordon at agordon@baaqmd.gov or (415) 749-4940.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director James Spering
BAAQMD Director Lori Wilson