

[EXT]Santa Barbara County APCD Comments on the Draft EIR for the DCPD Decommissioning Project

Emily Waddington <WaddingtonE@sbcapcd.org>

Mon 9/25/2023 11:08 AM

To:PL_Diablo <PL_Diablo@co.slo.ca.us>

 1 attachments (243 KB)

09-25-23 DCPD Decommissioning Draft EIR Comments.pdf;

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Good Morning Susan and Team,

Please find Santa Barbara County APCD's comments on the Draft EIR for the project attached.

Best,



Emily Waddington

Air Quality Specialist
Air Pollution Control District
Santa Barbara County

WaddingtonE@sbcapcd.org

Please note new phone number: (805) 979-8334

ourair.org [@OurAirSBC](https://twitter.com/OurAirSBC)  [Twitter](#)  [Instagram](#)

[Sign Up for Air Alerts](#)  [arrow](#)

September 25, 2023

Susan Strachan
San Luis Obispo County
Department of Planning and Building
976 Oso Street, #300
San Luis Obispo, CA 93408

Email Only: diablo@co.slo.ca.us

Re: Santa Barbara County Air Pollution Control District Comments on the Draft Environmental Impact Report for the Diablo Canyon Power Plant Decommissioning Project, ED2021-174/DRC2021-00092

Dear Susan Strachan:

The Santa Barbara County Air Pollution Control District (District) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the Diablo Canyon Power Plant Decommissioning Project.

Project Description

Pacific Gas and Electric Company (PG&E) proposes to decommission the power-generating facility, appurtenant structures, and infrastructure of the Diablo Canyon Power Plant (DCPP). Work is to take place in two phases. Phase 1, from 2024 till 2031, consists of pre-planning and decommissioning activities. Phase 2, from 2032 till 2039, consists of completion of soil remediation, final status surveys, and final site restoration. Various decommissioning and remediation activities will take place in San Luis Obispo County.

In Santa Barbara County, regulated waste material may be hauled by truck from the DCPP to a Santa Maria Valley Railroad facility known as Betteravia Industrial Park (SMVR-SB), for transport out-of-state by rail for disposal. The SMVR-SB facility is located approximately 1.6 miles west of the City of Santa Maria in the jurisdiction of the County of Santa Barbara. Infrastructure modifications at the SMVR-SB facility would include refurbishment of existing rail spurs, placement of steel road plates or installation of road base, temporary fencing, lighting, and an office trailer. Equipment for loading materials from trucks to railcars could include a temporary 400-ton electric gantry crane with generators, truck-mounted cranes, a railcar mover, and other diesel-powered off-road equipment. A 425-kilowatt trailer-mounted diesel generator may provide power to the site. An average of one to six truck trips would take place per month with a maximum of 15 truck trips per month. No more than two truck trips to the SMVR-SB site would occur on a given day. Waste transportation by rail is planned to occur between 2024 and 2029.

Aeron Arlin Genet, Air Pollution Control Officer

District Comments on the Draft EIR

- 1. District Approvals:** Please include the Santa Barbara County Air Pollution Control District as a Local/Regional Agency in *Table 1-1. Anticipated Approvals and Authorizations for DCPD Decommissioning* on page 1-17 of the Introduction section. The District may require Authority to Construct as well as Permit to Operate permits for operation of proposed equipment at the SMVR-SB site, including diesel generators and other diesel equipment not eligible for registration with the California Air Resources Board's Portable Equipment Registration Program (PERP). Despite the preemption over local land use agency's permitting authority pursuant to the Interstate Commerce Commission Termination Act, it is likely that the District still has permitting authority over these emission sources.
- 2. Ozone Plan Consistency:** Impact AQ-1 starting on page 4.2-14 of the Air Quality section should include an assessment of how activities within Santa Barbara County, including intensification of use at the SMVR-SB site, will be consistent with the District's 2022 Ozone Plan.¹
- 3. Non-cancer Health Risk Results:** The Toxic Air Contaminants subsection starting on page 4.2-25 of the Air Quality section should present the non-cancer risk results from the Health Risk Assessment (HRA) conducted. The results should be compared to CEQA significance thresholds for non-cancer risk. The District has a board-adopted significance threshold that a project not exceed a Hazard Index of more than one (1.0) for non-cancer risk (chronic and acute).

District Comments on the Health Risk Assessment for the SMVR-SB Site

The District has reviewed the HRA and has a few clarifying questions/comments. It is unlikely that resolution of these comments will substantially change the risk results and the District is relatively confident that regardless of the resolution of the comments below, health risk impact for the SMVR-SB site will remain below significance thresholds. Therefore, it is at the discretion of the lead agency whether to address the comments below and make revisions to the health risk modeling. We do recommend, however, that if any revisions to the health risk modeling are necessitated for other reasons that our comments be addressed as well.

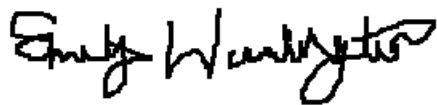
- 4. Source ID BETTER:** Source ID BETTER has 4.11E-05 lb/yr of diesel PM emissions included in the HRA. The submitted document titled *DCPD HRA Modeling File Map.docx* indicates that this source group includes "Sources inside Res5 heading to the SMVRR Betteravia rail yard." The District could not locate the emission calculations for this source group in the submitted spreadsheet titled *1. Phase 1 Calcs from PGE with edits for consistency from rdp 03142023 (2).xlsx*. Provide calculations for the diesel PM emissions for this source group.
- 5. Source ID BET_SITE:** Source ID BET_SITE has 6.35 lb/yr of diesel PM emissions included in the HRA. The railcar mover emissions shown in cell E178 of tab 8. *Rail_SB* are 0.003 ton/yr, equal to 5.11 lb/yr. Clarify what other emissions are accounted for in this Source ID.

¹ Available at: www.ourair.org/wp-content/uploads/2022-Ozone-Plan.pdf

6. **Source ID SBC:** Source ID SBC has 0.00288 lb/yr of diesel PM emissions included in the HRA. The trucking emissions shown in cells E126, E127, and E128 of tab 6. *Truck_SB* add up to 0.0364 lb/yr. Clarify why these values do not match.
7. **Locomotive Emissions:** Locomotive emissions are calculated in tab 8. *Rail_SB*. However, it does not appear that these emissions were included in the Health Risk Assessment Modeling.

If you have any questions on these comments please contact Emily Waddington, Air Quality Specialist, at (805) 979-8334 or WaddingtonE@sbcapcd.org.

Sincerely,



Emily Waddington
Air Quality Specialist
Planning Division

cc: David Harris, Manager, District Engineering Division [email only]
William Sarraf, Supervisor, District Engineering Division [email only]
Planning Chron File