



air pollution control district
SANTA BARBARA COUNTY

April 26, 2024

Susan Strachan
Decommissioning Project Manager
County of San Luis Obispo
Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408
Sent Via Email Only: p66refinery@co.slo.ca.us

Re: Santa Barbara County Air Pollution Control District Comments on the Draft Environmental Impact Report for the Phillips 66 Santa Maria Refinery Demolition and Remediation Project, SLC No. 2023050020, DP/CDP No. C-DRC2022-00048/ED23-054

Dear Ms. Strachan:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of the demolition of above ground infrastructure at the Santa Maria Refinery (SMR) and the remediation of the site. The SMR includes petroleum storage and processing facilities, primarily for high-sulfur heavy crude oil. Demolition-related equipment and material delivery vehicles and waste hauling trucks would use the existing designated haul route between the refinery entry/exit points and the Willow Road/U.S. 101 interchange. Project activities within Santa Barbara County are limited to truck and rail haul trips for offsite disposal of waste material and debris. For the purpose of the air quality assessment, demolition and remediation activities were assumed to occur continuously over a period of approximately three years and to begin as early as 2025. A substantial amount of the remediation work will be completed in the first three years, and then remediation will likely continue, but at a lower intensity level, over additional years (potentially up to 10 years) to finalize remediation and site grading and restoration. The project is located at 2555 Willow Road (State Route 1) in an unincorporated area of the County of San Luis Obispo, near Arroyo Grande and Nipomo, and approximately five miles west of U.S. Highway 101. The project site occupies approximately 218 acres within portions of two adjoining parcels: Assessor's Parcel Number (APN) 092-401-011 and APN 092-401-005.

The District has the following comments on the Draft EIR:

1. **Section 2.0 Project Description, Designated Haul Routes:** The District supports the designated haul route currently identified for the project of Willow Road to HWY 101. We recommend that the project trucks be restricted to this route unless deviation from this route is necessary due to emergency or other temporary or unforeseen circumstances. In the event, project haul trucks need to deviate from the designated route, we recommend that haul trucks avoid travel south via HWY 1 to Main St through the City of Guadalupe and areas designated by Senate Bill 535 as Disadvantage Communities (DACs) as identified by CalEnviroScreen 4.0 (Census Tract 6083002502).

Aeron Arlin Genet, Air Pollution Control Officer

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2. **Page 4.3-41, Section 4.3 Air Quality, Mitigation Measure AQ.3-1 Clean Construction**

Equipment: The District is supportive of the project's commitment to achieve an 85% reduction in diesel particulate emissions. However, we have a suggested revision to the allowance for equipment to install CARB Level 3 diesel particulate filters (DPF). To ensure functionality and performance of the control technology, the DPF must be compatible with the engine. The DPF must be verified by CARB to ensure the particular device is applicable to the end-users type of engine (see <https://ww2.arb.ca.gov/our-work/programs/verification-procedure-use-strategies-control-emissions-diesel-engines>). DPF installation on a non-verified engine is unlikely to result in the 85% PM reduction currently assumed and could pose other negative outcomes related to engine performance and operation. Therefore, we suggest that the measure be revised to clarify that equipment should be equipped with a Level 3 DPF that has been *verified* by CARB as compatible with the engine via Executive Order and the *Verification Procedure, Warranty and In-Use Compliance Requirements for In-Use Strategies to Control Emissions from Diesel Engines*. Additionally, regarding the option for the applicant to utilize equipment that meets U.S. EPA Tier 4 emission standards to achieve the 85% reduction in diesel particulate emissions, we recommend that the measure be clarified to specify that equipment must be *certified* to meet U.S. EPA Tier 4 emission standards, as equipment "compliant" with Tier 4 standards does not employ the same control technology to ensure the equipment performs at the Tier 4 emission limits.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 979-8337 or via email at BarhamC@sbcapcd.org.

Sincerely,



Carly Barham
Planning Division

cc: Planning Chron File