

May 9, 2018

Mr. Christopher Cannon
Director of Environmental Management
City of Los Angeles Harbor Department
425 South Palos Verdes Street
San Pedro, California 90731

Dear Mr. Cannon:

Thank you for providing the California Air Resources Board (CARB) the opportunity to comment on the City of Los Angeles Harbor District's (LAHD) Draft Environmental Impact Report (DEIR) for Berths 167-169 (Shell Oil) Marine Oil Terminal Wharf Improvements Project (Project) SCH#2015061102. The proposed Project is a wharf improvement project necessary to comply with Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS). MOTEMS are comprehensive engineering standards for the analysis, design, inspection, and maintenance of existing and new marine oil terminals. The proposed Project also includes a new 30-year lease between LAHD and Shell Oil Company.

LAHD prepared the DEIR to evaluate the environmental impacts related to construction and operations of the proposed Project. The DEIR concludes that significant and unavoidable impacts associated with operational air quality and greenhouse gas emissions will remain, even with mitigation. Even where impacts will remain significant and unavoidable after mitigation, the California Environmental Quality Act (CEQA) nevertheless requires that all feasible¹ mitigation measures be incorporated (see Cal. Pub. Resources Code § 21081; 14 CCR § 15126.2(b)). CARB staff recognizes the commitment LAHD has made to reduce harmful emissions from port activities and commends you on your progress. However, CARB staff recommends LAHD consider the emission control strategies, outlined in our attached comments on the proposed Berth 164 (Valero) Marine Oil Terminal Wharf Improvements Project (Elizabeth Yura to Christopher Cannon, April 19, 2016), as potential feasible mitigation measures.

To align with the goals of California's Sustainable Freight Action Plan, the State Implementation Plan, and CARB's efforts to reduce vessel at-berth emissions, we encourage LAHD to design the new terminal and associated infrastructure to accommodate zero or near-zero emissions technology. This would help ensure that LAHD is doing everything feasible to minimize significant air quality impacts posed by

¹For the purposes of CEQA, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. (California Code of Regulations, title 14, section 15364.)

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the proposed Project. Including these suggested measures in the proposed Project's design now would be the most cost-effective time to incorporate these technologies into the terminal.

CARB staff appreciates the opportunity to comment on the DEIR for the proposed Project. We hope LAHD will take advantage of this opportunity to incorporate alternative technologies and infrastructure into the design.

Please include CARB on your State Clearinghouse list of selected State agencies that will receive the Final Environmental Impact Report. If you have questions, please contact Robbie Morris, Air Pollution Specialist, Exposure Reduction Section at (916) 327-0006 or via email at robbie.morris@arb.ca.gov. You may also contact me at (916) 322-8285 or via email at richard.boyd@arb.ca.gov.

Sincerely,



Richard Boyd, Chief
Risk Reduction Branch
Transportation and Toxics Division

Attachment

cc: Morgan Capilla
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Lijin Sun
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ATTACHMENT



Air Resources Board



Matthew Rodriguez
Secretary for
Environmental Protection

Mary D. Nichols, Chair
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Edmund G. Brown Jr.
Governor

August 19, 2016

Mr. Christopher Cannon
Director of Environmental Management
City of Los Angeles Harbor Department
425 South Palos Verdes Street
San Pedro, California 90731

Dear Mr. Cannon:

Thank you for providing the Air Resources Board (ARB) the opportunity to comment on the Notice of Preparation (NOP) for the proposed Berth 164 [Valero] Marine Oil Terminal Wharf Improvements Project (Project) draft Environmental Impact Report (EIR). The Project would replace the current terminal with a new facility that would comply with Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS). While the Project is focused on compliance with MOTEMS rather than expanding the capacity of the terminal, we encourage the Port of Los Angeles (Port) to design the new terminal and associated infrastructure to accommodate zero or near-zero emissions technology. This would help ensure the Project is doing everything feasible to avoid or minimize any potentially significant air quality impacts posed by the Project. Incorporating these suggested measures into the Project's design now would be the most cost-effective time to incorporate these technologies into the terminal. It would also align with the goals of California's Sustainable Freight Action Plan, the State Implementation Plan, and ARB efforts to reduce vessel at-berth emissions, as discussed below.

ARB staff is currently considering amendments to the Ocean-going Vessels At-Berth Regulation (At-Berth Regulation). These proposed amendments are expected to include the addition of vessel types not currently covered by the At-Berth Regulation, including tankers. Tankers are a high priority for California's efforts to reduce air emissions because they are a large emissions source while at-berth, both statewide and in the South Coast Air Basin. Specifically, according to ARB's statewide emissions inventory, tankers now contribute more at-berth carbon dioxide and particulate matter emissions than any other vessel type, and are the second largest source of at-berth nitrogen oxides emissions after container ships. Emission reductions are necessary from this source to attain ambient air quality standards and to better protect nearby communities from the harmful effects of fine particulate matter.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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Among the control strategies currently under investigation are terminal-based approaches such as the following: (1) capture and control ("bonnet") systems, (2) shore-side electric booster pumps, and (3) shore-side (grid-based) power. While we are still in the early stages of investigating these emission control options, we encourage the Port to consider the possibility that one or more of these technologies may be needed in the future to meet air quality requirements for tankers or tanker terminals. We also encourage the Port to continue to explore new control strategies in addition to the ones described here.

With regard to the first control strategy, capture and control systems, barge-based systems are already in use for container ship auxiliary engines that could potentially be scaled up to accommodate the combined emissions from tanker boilers and auxiliary engines. In this case, the barge would be towed to a position alongside the vessel, where the capture and control equipment would be connected to the vessel with a barge-mounted crane. Another capture and control option would consist of a land-based system where the emission control devices and ducting system are located on the wharf. There are two projects under development that will be using this type of system. For either type of capture and control system, it would be easier to construct a new terminal designed to accommodate these systems (loading on the wharf from the barge or on-land equipment, footprint for the land-based system, etc.), rather than retrofitting later.

With regard to the second control strategy, the electric booster pump, a land-based pump could be used to reduce the load on the vessel boiler or other diesel-powered driver for the vessel pumps used to offload crude or other products. For this option, there would need to be an adequate footprint at the terminal or nearby for the electric motor and pump, and the electrical capacity to provide the necessary power. Even if the electric motor and pump are not included as part of the proposed Project itself, it may be worthwhile to provide space for this option in case it is pursued at a later time.

Finally, shore-power may be an option for the terminal if the operator expects to receive vessels that visit frequently, especially if they use electrically-driven pumps to offload their product. At this early stage in developing the Project, the terminal could relatively easily build in shore power, or the capability to install it later by constructing one or more vaults and conduit to run electrical lines to the shore-side infrastructure and utility inter-connection.

ARB staff appreciates the opportunity to comment on the Notice of Preparation for the proposed Project. We hope the Port will take advantage of this opportunity to

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incorporate zero or near-zero emissions technologies into the design, or the capability to design the Project to allow easy installation of these new and innovative technologies in the future.

Please include ARB on your State Clearinghouse list of selected State agencies that will receive the draft EIR as part of the formal public review and comment period. If you have any questions, please contact Ms. Angela Csondes, Manager, in our Technical Analysis Section, at (916) 323-4882 or via email at angela.csondes@arb.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elizabeth Yura".

Elizabeth Yura, Chief
Emissions Assessment Branch

cc: See next page

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cc: State Clearinghouse
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