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June 10, 2016

Ms. Jillian Wong
Mr. Danny Luong
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

SENT VIA EMAIL: jwong1@aqmd.gov

CC: dluong@aqmd.gov

Subject: Proposed Tesoro Merger, Facility ID#s 174655 and 800436

Dear Ms. Wong and Mr. Luong:

So Cal 350 Climate Action works with a coalition of individuals and groups from the Southern California area banding together to fight climate change. We envision a healthy climate through environmental, social, and economic justice, engaging and empowering our communities through a fossil-free future. SoCal 350 is affiliated with the international climate change organization 350.org and submit this letter jointly with our coalition member Tar Sands Action Southern California.

SoCal 350 appreciates the opportunity to provide public comment on the Proposed Title V Significant Permit Revisions and the Draft Environmental Impact Report (DEIR) for Tesoro Refining & Marketing Co., LLC's Carson and Wilmington Sites, Facility ID#s 174655 and 800436.

As a community organization engaged in the protection of resources and neighborhoods in Southern California, we opposed this project that would enable a massive 380,000 barrel of oil per day facility. Creation of the largest refinery on the West Coast is antithetical to the interests of a region that already suffers from some of the worst air quality in the United States due to the existence of six oil refineries, two large ports, multiple major freeways and a large concentration of urban refining.

MORE Storage, MORE Dangerous Fossil Fuels, MORE Danger to Our Communities

When Tesoro replaces two existing 80,000 barrel tanks with new 300,000 barrel tanks and builds six new 500,000 barrel tanks, and increase its capacity to 3.4 million barrels, this is the equivalent of a new oil terminal. Tesoro claims these storage tanks are for faster offloading and claim air pollution benefits, but if ships used electric power while in port (called cold ironing), they would not cause extra port emissions. Truth be told, bigger ships calling for more onshore crude storage spells more risk of spills.

Moreover, these large crude storage tanks make the project a likely source to store, refine and/or export large volumes of dangerous crude oils, including increased imports of highly explosive fracked North Dakota Bakken Shale, and heavy, strip-mined Canadian Tar Sands crude which is toxic, highly corrosive, and greenhouse-gas-intensive.

The DEIR does not consider the increased environmental impacts of greenhouse gases due to extraction and transportation of these dirty crudes. The DEIR must include the significant climate impacts caused by all the additional fossil fuels this expansion would allow to be burned in the air quality impact evaluation for this project. We ask why this was not included in the analysis? The SCAQMD cannot in good conscience certify an EIR that misses a glaring suite of impacts related to its core mission of protecting Southern California's air quality.

Tesoro has recently obtained approval for a two-year extension of a crude-by-rail to marine terminal in Vancouver, Washington and has bragged to its shareholders of its "West Coast Strategy" to bring cheaper crude (shale oil and tar sands) to its refineries as early as 2017. At the same time, this merger would give Tesoro an even bigger share of the oil market and allow it manipulate prices, which contrary to their public relations, would increase prices for the rest of us. This calls into question the argument that we are somehow energy independent when crude is imported from Canada, and places at risk our waterways from spills, and our communities with explosions, all the while charging higher prices. Safer and cleaner options exist and more we assent to the public relations of these profit-at-any-cost-to-the-rest-of-us companies, the more addicted we will be to industrial accidents, climate change, and sickened communities.

Air Pollution Reduction Strategy? We Assert NOT

While the project analysis quantifies a decrease in CO2 emissions, this is only the result of the required shut down of the Fluid Catalytic Cracking Unit (FCCU) at the Wilmington facility which the State of California required as a condition for approval of Tesoro's purchase of the facility. Tesoro should not be granted any air pollution credits to offset for other air pollution expansions that are part of the proposed project.

Tesoro is intentionally misleading the public by claiming that this project is an air pollution reduction and efficiency project. In reality, the only air pollution reduction would be in primary CO2 releases already occurring outside of the project as a result of the required shutdown of the FCCU (while again ignoring

the secondary impacts of the international mining, processing and transporting of their product through railroads, pipelines and cargo ships).

In reality, the project will increase emissions in our communities including VOCs and have neutral impacts on NO_x, SO_x, particulate matter and toxic emissions. Moreover, the DEIR seems to overstate the existing amount of emissions while underestimating the potential emissions after the Project is completed. This calls the accuracy of the DEIR into question.

Toxic Explosion Risk Increases Dramatically

The project calls for the modification of many major processing units inside the refinery including building new sulfur processing units. The project would add to LPG rail car deliveries, including butane and propane, which cause a major concern for our communities because of the risk of explosion from such rail cars in what is not only a densely populated area but a major center for commerce for the entire State of California.

The DEIR identifies potential explosion and toxic release risks due to the Project including BLEVE hazard (Boiling Liquid Expanding Vapor Explosion) from LPG rail unloading, and toxic release hazards from the Hydrocracker Unit, Catalytic Reforming Unit (CRU), Propane Sales Treating Unit (PSTU), and Sulfuric Acid Recovery Plant (SARP) areas.

Our region is overdue for a major earthquake and the dangers from large tanks full of hazardous and explosive materials (such as Hydrogen Sulfide), as well as the maze of underground pipelines are an unacceptable risk for our community.

The DEIR claims new emissions from flaring at the project would be “zero” even though many new equipment connections would be added to the flares. This does not seem accurate. This is just one of a number of deficiencies in the DEIR and Title V permit application, which failed to include alternatives that would have lesser effects.

We Demand Safer Alternatives

The Project is being touted as a boost to our local economy. In reality, the jobs created during the project will be temporary and there is no guarantee that they will be filled by local residents. History has shown us that mergers such as this are often designed to streamline operations by eliminating jobs, which would be a detriment to our communities.

How does further burdening our communities with pollution and accident risk improve the economy? We have safer and cleaner energy alternatives happening right now, so allowing these types of expansions to extend the life of a global-poisoning industry on will make it that much harder to stop the ongoing climate disruption happening across the world. SCAQMD should do their part by not capitulating this time to the hollow demands of an industry that thrives economically by creating environmental sacrifice zones, and places the bulk of the financial and contamination burden on the rest of us.

The SCAQMD has long failed the frontline communities located in the LA-Long Beach Harbor Area specifically including Wilmington, Long Beach, Carson, and San Pedro, in exchange for pollution offsets realized elsewhere. To approve this Tesoro expansion would be adding deliberate insult to the injury

already inflicted. We demand SCAQMD stand up for the rights of our communities and reject this project as proposed.

We ask that the SCAQMD require a redrafting of the DEIR that takes into account the many deficiencies pointed out here. We further ask that an alternative be included in the project that would eliminate the increases in storage and lessen the threats of explosions.

Again, SoCal 350 and Tar Sands Action Southern California are opposed to the Merger Project and request that the Title V permit not be issued and that the DEIR be sent back for re-drafting to include potential and real expected impacts which have not been addressed.

Sincerely,

A handwritten signature in blue ink that reads "Jack Eid". The signature is fluid and cursive, with a large loop at the end.

Jack Eid

Steering Committee, SoCal 350 Climate Action

A handwritten signature in black ink that reads "Jessica Aldridge". The signature is cursive and features a large, prominent loop for the letter 'J'.

Jessica Aldridge

Organizer, Tar Sands Action Southern California