South Coast
Air Quality Management District
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Draft Environmental Impact Statement/ Environmental Impact Report (Draft EIS/EIR) for the Proposed CALNEV (Kinder-Morgan) Pipeline Expansion Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final NEPA/CEQA document.

In the project description, the lead agency proposes the construction, operation and maintenance of a new 16-inch pipeline and ancillary facility to carry refined petroleum products from an existing facility in Colton, California to an existing facility in Las Vegas, Nevada. The proposed new pipeline would parallel two existing pipelines for most of the Nevada to California route. Part of the new pipeline would be installed along a 23-mile right of way (ROW) within the boundaries of the South Coast Air Basin in San Bernardino County. Along this 23-mile section, about an 11-mile section of the new pipeline passes through heavily populated neighborhoods and a high school in the cities of Rialto and Colton.

In the air quality section of the Draft EIS/EIR, the lead agency has determined that construction air quality impacts exceed recommended daily thresholds of significance. The AQMD staff recommends that additional feasible construction mitigation measures be considered in the Final NEPA/CEQA document. In addition, although the lead agency has included detailed supporting documentation for construction emission estimates including greenhouse gas emissions, the AQMD staff is concerned that a more detailed analysis for operational emissions was not included in the draft document. Further, the project description and air quality analysis do not address whether new equipment will be utilized at either the current or new pumping booster stations as a result of the proposed project. Installation of additional equipment at existing facilities or construction of new pumping stations within AQMD's jurisdiction may potentially require further permitting action. Detailed comments are attached to this letter.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIS/EIR. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:AD:GM

SBC120327-02
Control Number

Air Quality Analysis - Operations

1. In the project description, the lead agency has listed activities that will result in potential air quality operational impacts from activities including emissions from the potential new equipment at existing or potential new pumping booster stations, pipeline and tank off-gassing, etc. Based on the limited information in the operational air quality analysis, more detailed information is needed in the Final NEPA/CEQA document to demonstrate that operational impacts will be less than significant. The SCAQMD staff suggests that to further demonstrate its findings, the lead agency should quantify and document all potential project long-term air quality impacts (e.g., emissions from connections, valves, flanges, vehicular emissions, delivery trucks, worker trips, etc.) to demonstrate that project emission impacts are not significant. Should the lead agency determine that emission estimates exceed recognized thresholds of significance, mitigation measures should be adopted and included in the final document to reduce project air quality impacts to less than significant. Questions concerning potential AQMD permits and applicable rules concerning the proposed new equipment can be directed to AQMD staff at (909) 396-2618.

   In addition, the lead agency should also cite compliance with AQMD Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants in the Final NEPA/CEQA document since potential emissions may be generated from components (connections, valves, flanges, etc.) located at the new pump station and along the pipelines.

General Conformity

2. For general conformity purposes, the lead agency can rely on the 2007 Air Quality Management Plan (AQMP) for general conformity purposes in Draft EIS/EIR, as the 2012 AQMP has not yet been approved. As project construction is expected to occur in the 2013-2015 time frame, the reduction in NOx emissions from the ports located within the South Coast Air Basin (SCAB) due to the recession can cover the approximate 90 tons per year that the proposed project will add, hence there AQMD staff has no comment on potential general conformity impacts.

Emergency Generator(s)

3. In the project description, the lead agency states that the existing pumping station and the proposed new pumping station pipeline pumps would be powered electrically. In the event that emergency generator equipment will be used, AQMD permits would be required for the generator(s). Questions concerning potential AQMD permits and applicable rules can be directed to AQMD staff at (909) 396- 2618.

Contaminated Soils

4. In the project description, the lead agency describes trenching activities that might disturb soil containing petroleum hydrocarbons. In the event that any potential soil excavation activities disturb soil that has the potential to be classified as a hazardous waste, (e.g., petroleum hydrocarbons, etc.) contaminated sites would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil and that compliance should be referenced in the Final EIS/EIR.

Construction Mitigation Measures

5. In the Draft EIS/EIR, the lead agency has determined that project construction impacts exceed the SCAQMD recommended significance threshold for VOC, NOx, CO, PM10, and PM2.5, the AQMD staff recommends the following changes and additional mitigation measures during construction in addition to the measures proposed starting on page 3.6-29 to further reduce emissions, if applicable and feasible.

   Recommended changes:

   MM AQ-1b: Low Emission Construction Equipment.

   - All off-road diesel-powered construction equipment with a rating greater than 50 horsepower would be required to utilize compliant with EPA Tier 3 or higher non-road engine standards. In addition, all retrofitted construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
   - A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

   MM AQ-1c: Construction Emissions Reduction Plan.

   - Require ~~that all on-road vehicles be less than 10 years old; and~~ the use of 2010 and newer diesel haul truck (e.g., material delivery trucks and soil import/export, if applicable). If the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NOx and PM10 emission requirements.

Recommended additions:

- Limit the amounts of daily soil disturbance to the amounts analyzed in the Draft EIS/EIR.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Prohibit truck idling in excess of five minutes, on- and off-site.
- Reroute construction haul trucks away from congested streets or sensitive receptors areas.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Coordinate with local school officials to minimize construction impacts on school activities.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .