Appendix H

Draft SEIR Comments and Responses

Appendix H – Draft SEIR Comments and Responses

Section/Table	Page #
Responses to Comments	H-1

Comment Letters

Ailene Chambers Comment Letter	H-39
City of Bellflower Comments	H-40
City of Paramount Public Comment Meeting Comments	H-45
Coalition for Clean Air Comment Letter	H-52
Communities for a Better Environment Comment Letter	H-54
Dan & Joanne Hare Comment Letter	H-104
Jaime Lopez Comment Letter	H-105
Los Angeles County Sanitation Districts Comment Letter	H-106
Mike & Cindy Guillen Nelson Comment Letter	H-110
Paramount Unified School District Comment Letter	H-111
Southern California Association of Governments Comment Letter	H-114

Support Letters

Agustin Exiga Support Letter	H-118
Air Products and Chemicals, Inc. Support Letter	H-119
American Cancer Society Support Letter	H-120
Breathe Southern California and Healthy Air Alliance Support Letter	H-121
California Advanced Biofuels Alliance Support Letter	H-122
Campora Propane Support Letter	H-124
Chemco Products Company Support Letter	H-125
Cherne Contracting Corporation Support Letter	H-126
Dassel's Energy Support Letter	H-127
Domino's Pizza Support Letter	H-128
Expo Propane Support Letter	H-130
Fred Becerra Support Letter	H-131
FuturePorts Support Letter	H-133
Global Pump Service Support Letter	H-135
Kiewit Corporation Support Letter	H-136
Long Beach Area Chamber of Commerce Support Letter	H-137
Los Angeles County Business Federation Support Letter	H-139
Mass Electric Construction Company Support Letter	H-141
Mike McKown Support Letter	H-142
Move LA Support Letter	H-143
Nancy Coop Support Letter	H-144

Rebecca Guillen Perez Support Letter H-145
ROUSH CleanTech Support Letter H-146
Sacramento Clean Cities Coalition Support Letter H-148
South Gate Chamber of Commerce Support Letter H-149
Southeast Los Angeles County Workforce Development Board Support Letter H-150
Ted Johnson Propane Support Letter H-152
Total-Western Inc. Support Letter H-153
United Airlines Support Letter H-154
Van Unen Miersma Propane Support Letter H-155
Victor Lopez Support Letter H-157
Western Propane Gas Association Support Letter H-158
Western Propane Services, Inc. Support Letter H-159
Windmill Propane Support Letter H-161

Appendix H
AltAir Renewable Fuels Conversion Project
Final Subsequent Environmental Impact Report
Draft SEIR Responses to Comments
Comment Letters

Comment Number	Response
	Ailene Chambers
AC-1	The DSEIR utilizes various thresholds for determining significance. For air quality, the thresholds defined by the South Coast Air Quality Management District (AQMD) are utilized, as discussed in the DSEIR Section 4.2.3 and discussed by the South Coast AQMD here http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook. Localized thresholds are those related to pollutant concentrations in the immediate vicinity of the refinery due to activities at the refinery location. Regional thresholds are those related to all emissions from all Project-related activities in the Los Angeles area (the "basin"), which would include trucks and trains traveling in the area. For noise and vibrations, the City of Paramount Municipal Code and General Plan Guidelines are utilized. The SEIR discusses these in Sections 4.2 Air Quality and 4.7, Noise and Vibration. The South Coast AQMD thresholds are exceeded during construction activities for both the localized impacts and the regional impacts. Additional text and discussion have been added to the FSEIR in regard to areas around the refinery that could be subject to exceedances of the localized thresholds. Mitigation has been included in the SEIR that includes making air filters available to areas that are within the areas that could experience exceedances of the air quality thresholds during construction, as well as utilizing the cleanest construction equipment and clean trucks. Section 4.7, Noise and Vibration, indicates that the thresholds for areas around the refinery would not exceed the Municipal Code or an acceptable increase over the General Plan guidelines during construction and operational activities. Rail activity during the operational phase of the Project would exceed the General Plan guidelines as indicated in Section 4.7.4.
AC-2	The DSEIR utilizes various thresholds for determining significance. For air quality, the thresholds defined by the South Coast Air Quality Management District are utilized, as discussed in the DSEIR Section 4.2.3 and discussed by the South Coast AQMD here http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook. For noise and vibrations, the City of Paramount Municipal Code and General Plan Guidelines are utilized. For Air Quality during operations, the regional thresholds would be exceeded as discussed in the SEIR Section 4.2.4. Localized thresholds would not be exceeded. Mitigation to address these potential impacts has been included, although the mitigation would not be sufficient to reduce the emissions level to below the regional thresholds. Additional reductions in air quality impacts could be realized by utilizing the alternative that requires products be moved by pipeline to the maximum extent feasible, thereby reducing truck and rail, and associated emissions. As discussed in Section 4.7.4, noise impacts associated with operations would also occur along the rail connection corridor that could exceed the General Plan guidelines. Since the refinery does not control the rail connection, there are limited mitigation measures that can be required, although efforts to work with the rail company historically have had some success, such as limiting rail delivery times.
AC-3	A detailed traffic analysis was conducted to assess the potential impacts of the increased truck traffic on intersections in the vicinity of the refinery (see Appendix F). This analysis utilized accepted computer models to address potential changes in levels of service of the intersections, including the Lakewood and Somerset intersections. This modeling was reviewed by the CEQA consultant and the City of Paramount Engineer as well as the City of Bellflower Engineer in order to ensure the accuracy of the analysis. Impacts due to congestion were determined to be less than the thresholds and no changes in level of service designations would occur at any of the intersections. Note also that congestion is no longer utilized as a threshold for

Comment Number	Response
	CEQA analysis; only the total vehicle miles traveled are utilized. The traffic analysis was included in the SEIR for full disclosure purposes.
AC-4	The SEIR indicates that rail traffic would increase with the Project. The peak daily number of trains would increase from once per day to twice per day, and the number of days per year when this would occur would increase. The length of trains would be similar to the current and historical operations. The delivery and removal of rail cars has historically been managed appropriately, under mitigation measures implemented in the 2013 MND, and these measures would continue. These include limiting the timeframes when trains can be delivered. The processes involved in individual train arrival and departure would be the same under the Project as under the historical operations and no changes are proposed for the individual operations; only that more operations would occur. Multiple trains would not arrive at the same time. In order to ensure continued compliance with the measures limiting train issues identified in the SEIR and the 2013 MND, the SEIR mitigation measure T-3a requires a monitoring program with the results reported to the City, and "*Rail deliveries that occur within 30 minutes of school start or release hours shall be accompanied by a monitor at the Downey intersection*" and/or additional limits on delivery times depending on agreements with the rail company. These measures have been effective historically and are expected to be effective moving forward. In addition, the requirement for video recording of the railroad/Downey Intersection have been added to the FSEIR in order to troubleshoot any potential issues and ensure smooth operations. The refinery has an existing video system for security.
AC-5	Electro-magnetic fields (EMF) are associated with electrical systems, including power lines as well as substations. According to various studies (NCCEH 2022), magnetic field strength varies depending on voltage and current, type of transformer and substation, and distance from the source, with increasing distance corresponding to decreasing magnetic field strength. The highest magnetic field is usually produced by the lines and cables supplying the substation and not by the equipment inside the substation itself (NCCEH 2022). "*Electric and magnetic fields produced by substation equipment are generally not appreciable beyond the substation boundaries*" (NRC 1997). Spot measurements in public areas in European cities were conducted to summarize outdoor averages of magnetic fields, where magnetic field strength ranged from 0.05 – 0.2 μT (microTesla) (NCCEH 2022). Higher values occurred directly beneath high voltage power lines, while maximum fields at boundary fences of above ground substations were up to 20-80 μT. Measured values at a perimeter fence surrounding an above ground 275-400kV substation averaged 10 μT. In comparison, magnetic field measurements at UK substations had a mean value of 1.1 μT at the substation boundary and 0.2 μT up to 1.5 m from the boundary. The U.S. and California do not have specific limits, but limits in Europe range from 0.4 to 100 μT. As the distance from the substation to the closest refinery fence line would be 280 feet, EMF levels from the refinery are not anticipated to exceed even the strictest European standards.
AC-6	The construction activities will be subject to the standard stormwater requirements associated with any larger construction project in California, which will limit runoff and ensure that area waterways are not contaminated by construction-influenced stormwater. The amount of stormwater that could be collected on-site and allowed to soak into the ground and affect groundwater would be similar to stormwater collection historically at the refinery siince all refinery stormwater is collected in the stormwater collection area located at the south-west corner of the refinery site.
AC-7	The red line on the map at the Mustang facility appears to be the red roof of the Mustang facility and is not related to the Project.
AC-8	There is a containment area located at the south-west corner of the refinery at the corner of Downey Ave. and the railroad tracks. This area contains runoff from the refinery and allows for containment and testing of refinery surface water before discharging to the City stormwater system.

Comment Number	Response
	The storm water containment pond is on the west side of the facility and is used to collect stormwater from the refinery prior to treatment. It is only used for rainwater. AltAir has an NPDES permit that allows to discharge to the storm drain only if all of the containment is full and the rain continues. Otherwise, the storm water is routed back into the process water treatment system for discharge to the Los Angeles County Sanitation District under wastewater permit conditions. Sheet flow is the rainwater that drains out of parking lots on the west side of the facility and the non-process area around the scalehouse on the east side of the facility. Samples are taken per the general permit requirements.
AC-9	Surrounding land uses have been added to Section 4.6 in the FSEIR. Section 4.6 mentions and describes all the immediately surrounding land uses to the refinery.
AC-10	Section 4.7 discusses the potential effects of vibration as a function of distance from activities. As indicated in Section 4.7.4, impact N.3, vibration is discussed and indicates that construction-related equipment would not produce vibration levels exceeding the thresholds within about 25 feet of the construction activities, or as much as 82 feet using the more stringent Caltrans guidelines. In addition, vibration levels would be temporary and would be below the levels identified as annoying or causing building damage and impacts associated with construction. Vibration impacts are therefore identified as less than significant. Water pollution could occur due to stormwater runoff. Stormwater runoff would be controlled as part of construction requirements. The refinery currently has a number of areas where historically contaminated soils and groundwater are an issue, and these are currently being addresses as part of a Cleanup and Abatement Order by the State Water Resources Control Board (Order No. 85-17 and 97-130). See Section 4.4.1.8 in the SEIR. Some of these contaminated soils will be removed as part of the Project construction activities, and these contaminated soils movements will be managed through a South Coast AQMD required Rule 1166 plan, including air monitoring and soil management.
City of Bellflower	
CB-1	A visual simulation from a City of Bellflower location has been added to the FSEIR showing the warehouse building, additional refinery equipment (if visible) and the loading racks (also if visible). Note that there is substantial vegetation of the east side of the refinery, preventing direct views of many refinery components from the City of Bellflower.
CB-2	Health risk assessments (HRA) are complicated and technical assessments are generally conducted under the review and consultation with the local air agency. The HRA conducted for this analysis was extensively reviewed by both the CEQA consultant and the South Coast AQMD. Additional text has been added to the FSEIR to clarify the HRA approach and results to the general public utilizing definitions and descriptions provided on the CARB website as well as specifics associated with this Project (see https://ww2.arb.ca.gov/resources/documents/health-risk-assessment)
CB-3	The proposed operations of the refinery under the Project would be similar to the historical operations of the refinery over the last few years operating with the renewable fuels feedstocks. One of the concerns associated with operating with renewable feedstocks is the potential for odors. According to the South Coast AQMD complaints files, the historical operations have not presented an increase in any odor issues. Moving forward with the Project and the continued handling of the renewable feedstocks and the refinery operations most likely will not produce any additional odor issues. There are existing methods for handling odor issues and complaints, specifically through the South Coast AQMD and the City of Paramount. Any odors that are confirmed to be a result of refinery operations would be issued a nuisance violation and measures to correct the odors would be implemented and overseen by the South Coast AQMD. There is the potential for additional odors from the nontechnical grade feed materials that may be anticipated for use. For this reason, tanks that are storing feed materials all have carbon vapor control and all vents from

Comment Number	Response
	the Pretreatment Unit will also have other vapor control (see Section 4.2.4.4 of the SEIR). The Pretreatment Unit will also generate wastewater that requires additional treatment prior to discharge to the permitted LACSD discharge point, which will also have odor control. The wastewater system is discussed in Section 4.10.4.3 of the SEIR.
CB-4	Text has been added to the FSEIR indicating that the City of Bellflower will be included in the coordination and approval of the NOx reduction program.
CB-5	Figure 4.4-5 shows all areas that could be impacted by an accidental release and subsequent fire, explosion or toxic impact from equipment located at the refinery. None of these scenarios would impact the City of Bellflower. This is primarily due to the fact that the closest refinery units are located more than 700 feet from the City of Bellflower and that the hazardous material inventories, which could cause the most impacts from the refinery, the gas liquids tanks, are located over 1,800 feet from the City of Bellflower. Note, however, that the natural gas pipeline would be installed down Lakewood Blvd., and that impacts from an accident scenario along the natural gas pipeline could impact areas within the City of Bellflower along Lakewood Blvd. Off-site refinery sources (i.e., the pipeline scenarios) are not shown in Figure 4.4-5.
CB-6	Table 2-1 clearly details the Project levels of activity, both peak and average, associated with the refinery operations as part of baseline and as part of the Project. Rail traffic would increase from a peak of 1 rail delivery per day to 2 per day under the Project, and from 95 per year to 312 per year under the Project, for example. These are the values that are utilized in the detailed air quality spreadsheets and calculations, as well as the cancer risk estimates and the noise analysis. The Draft SEIR provides details on the maximum estimated rail, truck and marine traffic and analyzes their impacts throughout the SEIR. As discussed in the Draft SEIR, the Project is expected to generate up to 3 barges per month or 36 barge shipments per year (see pages page 2-12, 4.2-31 and Appendix B). As discussed and analyzed in the Draft EIR, the Project is expected to increase rail delivers from a peak day of 33 to 50 rail cars per day page (see pages 2-23 – Project Description, 4.2-30 – Air Quality, 4.4-39 – Hazards, 4.7-36 – Noise, and 4.8-23 through 4.8-24 – Transportation and Circulation). Detailed emission calculations for rail emissions are shown in Appendix B and detailed noise analyses for rail/locomotive engines are provided in Appendix E. As discussed and analyzed in the Draft SEIR, peak trucks are expected to increase from 156 to 540 (see pages 4.2-30 – Air Quality, 4.7-36 - Noise, 4.8-17 and 4.8-21 through 4.8-23 – Transportation and Circulation). Detailed emission calculations are shown in Appendix B, detailed noise analyses are provided in Appendix E, and detailed Traffic Assessments are provided in Appendix F. Transportation hazards are specific to project design features, not the level of vehicles forecasted to be generated by a project. The Project will not change the design of roadways in the vicinity of the Project site. The quantitative traffic analysis, summarized in Section 4.8 and detailed in Appendix F, assesses the potential impact on traffic congestion at area intersections, including those intersections in the City of Bellflower. There are projected to be no changes in levels of service at any of the intersections.
CB-7	CEQA bases impacts on the incremental changes from a defined baseline operations. If the Project does not change the baseline operations or changes the baseline operations but in a manner that is below defined thresholds, then the impacts are considered to be less than significant. The baseline operations of the refinery include the transportation of jet fuel and hydrogen by pipeline. The Project would not change the jet fuel transportation in pipelines in a manner that would change the hazards that the public is exposed to. Hydrogen in the hydrogen pipeline would actually cease to be utilized as much, thereby reducing the frequency of the hazards that the public is exposed to from the hydrogen pipeline; however, since the hydrogen pipeline may be occasionally used as a backup, no "beneficial" credit was taken for this reduction in use of the hydrogen pipeline. The natural gas pipeline is the only offsite transportation by pipeline that would actually introduce

Comment Number	Response
	new hazards to the public and it is therefore classified as significant and unavoidable as described in Section 4.4. The SEIR must adhere to the requirements of CEQA in order to be a defensible full disclosure document available to the public.
CB-8	Additional mitigation has been added to the FSEIR to include monitoring of intersection pavement conditions and help determine issues that may contribute to deteriorated pavement due to refinery traffic. Note that the 540 trucks per day is a peak truck level, based on the maximum throughputs of the truck racks. The average truck level would be substantially fewer trucks. Long term traffic impacts on roadway pavement are primarily associated with average long term traffic as well as vehicle weights. Note also that the environmentally preferred alternative would require that pipelines be used to the maximum extent feasible and that this may also reduce truck activity.
CB-9	The Traffic Management Plan for construction activities will be prepared prior to the beginning of construction activities. The City of Bellflower has been added to the review listing for the Traffic Management Plan in the FSEIR. The City's concern regarding heavy-duty trucks is noted. The Project's heavy-duty truck impacts have been evaluated throughout the EIR, including pages 4.2-30 – Air Quality, 4.7-36 - Noise, 4.8-17 and 4.8-21 through 4.8-23 – Transportation and Circulation). Detailed emission calculations are shown in Appendix B, detailed noise analyses are provided in Appendix E, and detailed Traffic Assessments are provided in Appendix F.
CB-10	The City of Bellflower has been included in the Traffic Management Plan in the FSEIR mitigation measure for review and approval. The Mitigation Measure includes funding to the City of Bellflower: Mitigation Measure T-1a "Provide funding and coordination to the cities of Paramount and Bellflower to restripe the Lakewood Blvd. southbound lane to have a dedicated right turn lane on to Somerset Blvd." As owner of the roadway, the City of Bellflower would need to approve the modification to allow the proposed striping of Lakewood Boulevard, southbound at Somerset Boulevard. Note the recommendation is based on City of Paramount traffic analysis guidelines; however, the outside southbound lane at the intersection, according to the TIA preparer, has enough space to have a through and right-turning vehicle simultaneously and, therefore, currently has a de-facto right-turn lane. The calculation for intersection operations improves with the presence of a right-turn lane, but since it is not striped it was not accounted for in the existing geometric assumptions. Nevertheless, the City Public Works can assess the location for potential southbound right-turn lane striping considering factors such as the access management of adjacent driveways and transit operations.
CB-11	Section 4.4.1.7 and Table 4.4.9 details the potential hazards associated with natural gas pipelines. Section 2, Figure 2-5 shows the location of the proposed natural gas pipeline. Additional text has been added to Section 2 describing the Cities which the pipeline would be installed through. The City boundaries have been added to Figure 2-5 in the FSEIR.
CB-12	The DSEIR indicates that the language shall specify the use of CNG trucks in mitigation measure AQ-1a, specifically "*During construction, require the use of zero-emissions (ZE) or near-zero emissions (NZE) trucks (e.g., material delivery trucks and soil import/export), such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr).*" However, these trucks may not be available and therefore newer diesel trucks are allowed to be used if CNG trucks are not available. This mitigation measure has been proposed by the South Coast AQMD in other CEQA documents and has been reviewed and approved by the South Coast AQMD and is therefore considered appropriate.
CB-13	Section 4.2 and Appendix B, provides extensive analysis and quantification of air emissions, has been thoroughly reviewed by the CEQA consultant and the South Coast AQMD, provides extensive equipment listing, as well as hours per day of use, and is very detailed in its assessment of impacts. The noise analysis, Section 4.7, and Appendix E, provide detailed assessment of potential equipment use and peak noise levels associated with construction activities, as well as noise levels associated with pipeline installation. The

Comment Number	Response
	details of specific utilities that are located within a ROW and detailed design drawings quantifying the avoidance measures is outside the scope of CEQA and is normally handled during the design review process for any project.
CB-14	Text has been added to the Construction Management Program to ensure that the City of Bellflower will be included for construction activities that occur within the City of Bellflower.
CB-15	Environmental justice issues are fully disclosed in the DSEIR in Section 4.11. Environmental justice issues are independently not considered a CEQA issue and are not addressed in the CEQA guidelines or the CEQA Appendix G. However, the State of California Attorney General has indicated a need to address the potential for impacts that could impact environmental justice concerns. These issues include appropriate levels of mitigation for significant and unavoidable impacts in air quality, noise and other issues areas that could impact environmental justice communities. The mitigation measures are fully disclosed and documented in the DSEIR, including construction measures such as the use of cleaner trucks and construction equipment, and the use of residential air filters to reduce potential impacts from localized air pollutant impacts. These mitigation measures, in air quality, noise, traffic, etc. all work to reduce the potential impacts on environmental justice communities and are fully disclosed and presented in the SEIR.
CB-16	The outside southbound lane at the intersection, according to the TIA preparer, has enough space to have a through and right-turning vehicle simultaneously and, therefore, currently has a de-facto right-turn lane. There is no recommendation for a third southbound 12-foot-wide "through" traffic lane on southbound Lakewood Boulevard. There is a recommendation for the City to consider formalizing the southbound striping at the intersection to include an exclusive right-turn lane to satisfy the City's traffic impact analysis threshold. While the intersection operations analysis would show an improvement in conditions with a striped southbound right-turn lane, the outside southbound lane at the intersection has enough space to have a through and right-turning vehicle simultaneously and therefore has a de-facto right-turn lane. Nevertheless, the City Public Works can assess the location for potential southbound right-turn lane striping considering factors such as the access management of adjacent driveways and transit operations. In comparison, the Lakewood Blvd. southbound right turn on to Rosecrans Blvd. (where there is a stripped left lane, two through lanes and a right turn lane, the same as proposed in the SEIR for Lakewood Blvd. and Somerset Blvd.) has about 47 feet from the curb to the center divider and 35 feet from the curb to the left turn lane, which is exactly the same spacing that is available at Lakewood Blvd. and Somerset Blvd. Multiple meetings with the City of Bellflower, the City of Paramount and the TIA preparers, and the CEQA consultants, occurred as part of the DSEIR review process. If additional engineering work is needed, then this would occur as part of the implementation of the permit process. Note that, as indicated in the SEIR Section 4.8.4.1, traffic congestion and levels of service are no longer CEQA thresholds considerations and that the TIA recommendations that could lead to better traffic flow and reduce congestion are included in the SEIR for full disclosure purposes and recommendations, not CEQA-required mitigations. The details of the traffic congestion analysis will be determined through the permitting and plan review stage in the respective Cities.
CB-17	Queuing and stacking analysis was conducted for the PM peak hour based on direction from the Cities of Paramount and Bellflower. Based on the TIA analysis, the northbound left-turn lane was modeled to have an average queue of 150 feet and a 95th percentile queue of 257 with the timing sheet provided by the City of Bellflower and an average queue of 106 feet and a 95th percentile queue of 237 feet with a signal timing optimized for the PM peak hour conditions. However, as indicated in the SEIR Section 4.8.4.1, traffic congestion and levels of service are no longer CEQA thresholds considerations and that the TIA recommendations that could lead to better traffic flow and reduce congestion are included in the SEIR for full disclosure purposes and recommendations, not CEQA-required mitigations. Please note that the Traffic Impact Analysis is informational and the evaluation of a

Comment Number	Response
	Project's impacts on traffic conditions on nearby roadways and intersections shall not constitute a significant environmental impact (CEQA Guidelines Section 15064.3) The details of the traffic congestion analysis will be determined through the permitting and plan review stage in the respective Cities.
CB-18	With red-curb installation along all of Andry Drive, there is sufficient room for trucks entering Andry Drive from Lakewood Blvd. to not be impeded by trucks exiting Andry Drive onto Lakewood Blvd. The Caltrans Highway Capacity Manual Section 404 specifies a California Legal Design Vehicle minimum turning radius of 50 feet, at low speeds. See figure below demonstrating that a 50-foot turning radius is provided at the intersection of Andry and Lakewood, with enough room to allow for a truck to also be exiting, particularly if red curbs are installed all along Andry Drive, as directed in the SEIR.  The TIA states the controlling factor in the prevention of stacking of Project site truck queues onto Lakewood Boulevard or Somerset Boulevard is the processing time at the inbound gate. Therefore, it is recommended that when peak inbound demand on the gate occurs, a second gate would be opened within the next hour to clear trucks waiting for inbound facility access in the staging area and prevent any queue stacking onto public roadways. The TIA did not indicate the need for additional off-site storage with the management of the inbound demand at the gate, therefore, there is no need to dedicate property and construct a dedicated right-turn access lane. A right turn lane, and associated modification to the curbing and walkways along Lakewood Blvd. north of Andry Drive, would cause impacts to neighboring business, specifically the Mustang facility located along Lakewood Blvd. north of Andry Drive, and could impose additional impacts. The need for a right turn lane along Lakewood Blvd. north of Andry Drive was discussed and rejected as part of the City of

Comment Number	Response
	Bellflower and City of Paramount meetings during review of the DSEIR. Note also, as indicated in the SEIR Section 4.8.4.1, traffic congestion and levels of service are no longer CEQA thresholds considerations and that the TIA recommendations that could lead to better traffic flow and reduce congestion are included in the SEIR for full disclosure purposes and recommendations, not CEQA-required mitigations. The details of the traffic congestion analysis will be determined through the permitting and plan review stage in the respective Cities.
CB-19	At the point that vehicles and trucks would be exiting Andry Drive onto Lakewood Blvd., there would not be right turn lanes to cross or any lanes to cross, and therefore, at that location, no impediments would occur. Note that Andry Drive is located over 300 feet from the Lakewood Blvd./Somerset Blvd. intersection, which is farther than a right turn lane would be installed (note that the dedicated right turn lane on Lakewood Blvd. southbound and Rosecrans Ave is 150 feet and is very similar to what is proposed in the SEIR for Lakewood Blvd. southbound/Somerset Blvd.). In addition, there are multiple business located south of Andry Drive along Lakewood Blvd., including Sky Burgers, Harbor Products and automotive repair services, that could be potentially impacted by an extended right turn lane. There is no recommendation for a third through lane to be installed southbound on Lakewood Boulevard. The recommendation is for the City to consider formally striping a dedicated right-turn from the existing southbound shared -through right-turn lane if the City deems it to be an improvement to operations. The site trucks are specifically directed not to enter the City of Bellflower via Somerset Boulevard; therefore, trucks would not cross the southbound lanes of Lakewood Boulevard to access the southbound left-turn lane. Note also, as indicated in the SEIR Section 4.8.4.1, traffic congestion and levels of service are no longer CEQA thresholds considerations and that the TIA recommendations that could lead to better traffic flow and reduce congestion are included in the SEIR for full disclosure purposes and recommendations, not CEQA-required mitigations. The details of the traffic congestion analysis will be determined through the permitting and plan review stage in the respective Cities.
City of Paramount Public Comment Meeting	
RR-1	The speaker provides comments about global warming and other environmental issues. However, no specific comments are included regarding the Draft SEIR or its contents. As such, no additional response is required. The Draft SEIR contains an extended discussion on climate change and greenhouse gases under Section 4.3.
GC-1	Paramount Pipeline is a sister company to AltAir Paramount, both of which are owned by World Energy. On December 8, 2021, Paramount Pipeline and Kinder Morgan were jointly hydrotesting a pipeline, a section of which belongs to Kinder Morgan and a section which belongs to Paramount Pipeline. Kinder Morgan was taking the lead on this hydrotest as the companies take turns on alternate hydrotests. Prior to performing the hydrotest, the pipeline is drained of product and flushed with water to remove all of the product in the pipeline. After the flushing, the pipeline is blocked in at one end and again filled with water. The pipeline is then pressured up to above its normal operating pressure to ensure the integrity of the pipe. The pressure was monitored by both companies, and when the pressure in the line dropped, it was assumed there was a leak in the pipeline and Kinder Morgan called the required agencies. The specific location of the release; however, was not determined until December 16, although Kinder Morgan, Paramount Pipeline, as well as the Hazmat division of the LA Fire Department, drove along the pipeline pathway. There were heavy rains during the week, which precluded gas testing of the lines, so a "smartball" technology was selected. The smartball floats along through the pipe on top of a water layer and can detect leaks in the pipe. The smartball operation was able to be scheduled on December 16, and on that day a release was found on Somerset and Texaco, in front of the Paramount Post office. The site was excavated, and liquids (residual renewable diesel and water) were removed via vacuum truck. Some of the oily water got into the storm drain, so the storm drain was also cleaned. Paramount Pipeline worked with the City and the City's Public Works Division. They also were in

Comment Number	Response
	direct daily contact with the Hazmat Division of the LA County Fire Department and the Regional Water Quality Control Board (RWQCB). Once the pipe was repaired and the area was cleaned up, the excavation was covered and left while Paramount Pipeline and the RWQCB came to agreement on a cleanup standard for the soil. Apparently, after the area was cleared, a citizen called various agencies trying to determine what kind of incident occurred and did not receive sufficient response and therefor was concerned a toxic spill had occurred.
AC-1	See detailed responses to AC-1 thru AC-10 above. The Construction Mitigation Measure requires neighbors to be notified prior to construction activities. Additionally, the facility is required to comply with AQMD Rules 1166 and Rule 403. Rule 1166 requires monitoring and control of potentially VOC contaminated soil, and Rule 403 requires a dust mitigation plan. Both of these plans require notifications and approvals from the Air Quality Management District and will be completed prior to start of excavations.
SW-1	The comment on the benefits of the Project and in favor of the Project are acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
BC-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
NG-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
WB-1	The City of Bellflower's detailed written comments are responded to under CB-1 to CB-19.
TF-1	The comment in favor of the Project and the quality of the Draft SEIR are acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
CH-1	The comment in favor of the Project and the quality of the Draft SEIR are acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
JD-1	The comment addresses potential health issues as a result of the Project. Health impacts are discussed under Section 4.2, Air Quality. The Draft SEIR found that toxic emissions from the proposed Project would not exceed the South coast Air Quality Management District's thresholds. In addition, the Draft SEIR found that the Project, once operational, would result in a reduction of the cancer burden to the community.
RH-1	The comment against the Project is acknowledged. There is no specific comment on the Draft SEIR and as such, no additional response is necessary. AltAir does use deodorizer, particularly when it is required to open equipment to perform required maintenance. Although equipment is depressured and cleaned before opening, there is still generally some odor left behind, so AltAir sets out misting deodorizers that help knock the odorous materials down as well as provide a nicer scent for the neighbors.
Coalition for Clean Air	
CCA-1	The Project proposes to utilize the renewable feedstock to the fullest extent, meaning that renewable gasses from the feedstock materials will be used in the refinery process, heating, etc. Renewable fuel gas would be used throughput the refinery. Renewable feedstock for the hydrogen production is not considered feasible on the refinery site at this time with the current range of technologies (see Section 5.3.1.5). However, in the future if additional renewable feedstocks are available, it would be in the interest of the refinery to incorporate these methods as the intent of the Project is to produce fuels with a low carbon content in order to gain credit as part of the California Low Carbon Fuel Standard. As additional means of generating renewable feedstocks on-site, such as renewable hydrogen, are not available at this time as part of this Project, they are considered speculative under CEQA.
CCA-2	Battery and fuel cell trucks are currently in the demonstration phases at this time (WSJ, Nov 9, 2021). They have been shown to be feasible in demonstration projects, such as for Drayage trucks at the Ports, but they

Comment Number	Response
	are not commercially available in large scale. In addition, the trucks that would transport the refinery products are not trucks that are owned by the refinery, and therefore the ability to require different technologies may be somewhat limited. Through the generation of renewable fuel as part of the Project, and the use of these renewable diesel fuels in the basin, substantial GHG emissions reductions would be realized. The requirement for construction trucks newer than 2010 was reviewed and approved by the South Coast AQMD and used in other South Coast AQMD CEQA documents. The California requirements for newer construction trucks than 2010 have a number of exemptions, including lower milage trucks and some construction trucks, so not all vehicles are required to achieve model year 2010 or newer by 2023. But most trucks would be required to comply by 2023 as indicated. Note that the requirements in the SEIR for 2010 trucks only applies to construction trucks. Operational trucks require the use of 2017 or newer trucks.
CCA-3	The refinery has committed to working with the rail company to achieve some emissions reductions, although there is no specific authority to do so by the refinery over the rail company. The rail company has been cooperative in delivery schedules, but the use of specific Tier IV locomotives would be speculative at this time. The SEIR discusses these limitations.
CCA-4	Refinery operations are required to obtain permits from the South Coast AQMD and to comply with BACT requirements for NOx. SCR systems achieving substantial NOx reductions are already being proposed and there are few additional measures that could be implemented at the refinery to reduce NOx emissions. The majority of regional NOx emissions associated with the Project are generated by the mobile sources. Refinery equipment accounts for 12% of the NOx emissions. The fund to produce some level of NOx reductions in the community is not quantified since all the sources of NOx reduction are not known at this time and no established programs are in place in the City. No credit for the program has been taken in the CEQA analysis and the resulting impacts are still considered significant and unavoidable. Also, see response to CBE-16.
CCA-5	The NOx reduction program is, in effect, a type of community benefits agreement arrangement as it provides for funding of various activities that could produce a reduction in NOx emissions, such as car buy-backs, installation of electric charging stations, and the replacement of some City-owned vehicles and equipment with lower-emitting alternatives. Additional community benefits arrangements could be implemented as part of the permitting process.
Communities for a Better Environment	
CBE-1	The total H2 demand for the Project is yet to be determined. As mentioned by CBE in comments CBE-5 and CBE-14, varying feedstocks will require varying amounts of hydrogen to process and the Project objective at this time is to build and serve a renewable fuels production facility. Additionally, the hydrogen pipeline to Carson is currently permitted to provide unidirectional hydrogen feed to the AltAir facility. AltAir does not control use of the pipeline. Additional permitting would be required by the pipeline owner to accommodate the use of the pipeline for outgoing hydrogen transportation. Alternative uses of any potential excess hydrogen generated would be considered speculative for this Project at this time.
CBE-2	The Project would refine renewable feedstock into renewable transportation fuels. As part of the refining process, fossil fuels would need to be used in order to provide additional heat and the production of hydrogen. The SEIR in Section 2, as well as Table 2.1, provides the details on the amounts of trucks, trains, ocean vessels, hydrogen, natural gas and electricity required by the Project and provides full disclosure of the refinery energy needs in order to achieve the Project objectives. The comment characterizes the blending of conventional petroleum distillates (i.e., diesel and jet fuel) with the renewable diesel and jet fuel that is produced by the Project as an increase in demand for petroleum distillates. The Project does not create an increase demand in petroleum distillate production because fuel demand is not dictated by fuel producers but is a function of consumer demand. The Project will, in fact, provide renewable diesel that will offset, on a gallon per gallon basis, the amount of petroleum diesel needed

Comment Number	Response
	to meet the current diesel fuel demand in the region. The blending of renewable diesel with petroleum diesel does not require additional petroleum diesel to be manufactured as the comment states. The same holds true for jet fuel demand. Both the renewable and conventional jet fuel are kerosene range hydrocarbons. Aviation fuel specification currently requires the blending of renewable jet fuel with conventional fuel. Successful flight testing is being conducted using unblended renewable fuel; when renewable fuel is accepted, AltAir will no longer be required to receive and blend renewable with conventional jet fuel. The Project will use petroleum blendstocks as required to meet specifications. The use of these blendstocks is disclosed in Section 4.2, Air Quality, and emissions from receiving and storing the petroleum blendstocks at the tanks and loading racks are calculated to provide the conservative worst-case emissions estimates for the Project.
CBE-3	Lakewood Tank Farm was described on page 2-1 and in Table 2-2 of the Draft SEIR as using the two existing 55,000-barrel tanks for storage and blending of renewable jet fuel and conventional (petroleum-based) jet fuel. Use of the Lakewood Tank Farm and the pipeline between the refinery and the tank farm would reduce truck traffic out of the refinery and is therefore discussed as in the alternatives section. The Draft SEIR evaluated the trucking of the jet fuel in its air quality and risk assessments because using trucks provides the worst-case impacts analysis and the pipeline may not always be available due to maintenance or scheduling conflicts with the receiving end. The Paramount facility storage tank modifications are described in Table 2-2 of the Draft SEIR as modifications to approximately 25 permits to change the materials/commodities to be stored to include additional types of renewable feedstocks and remove the storage of crude oil and to enlarge up to three storage tanks to accommodate the loss of tanks that are demolished in areas that are being repurposed. The storage tank modifications are also described in Appendix B on page Appendix B Part 2-10 and Table A-8 on pages Appendix B Part 2-88 through Appendix B Part 2-102, the emission changes are shown by tank on pages Appendix B Part 2-27 through Appendix B Part 2-29, and the emission calculations are provided in Attachment B of Appendix B on pages Appendix B Part 2-283 through Appendix B Part 2-568. Overall petroleum storage capacity will be reduced by approximately 280,000 barrels as 46 tanks are being removed to allow space for the process equipment. With fewer tanks and less capacity, three tanks are being considered for an increase in height to replace some of that capacity (approximately 62,500 barrels). One of the tanks (shown on Figure 2-2 as Modified Feed) would be more visible outside the refinery and is included in the aesthetics study. All the emissions and health risks of all of the storage tanks are included in the Air Quality Impacts Study (Appendix B of the Draft SEIR) so that the public and decisionmakers do not have to speculate about the proposed changes and the potential environmental impacts.
CBE-4	As listed in Table 2-5, AltAir would ensure that any potential underground structure that may be installed as part of the Project will be permitted as required; however, there is no underground fuel or chemical tank included in the Project. Currently, existing inground structures that were used for stormwater collection, process water collection and other containment structures that were historically recorded as Underground Storage Tanks are being removed from this definition by the Los Angeles County Department of Public Works. This effort will reduce the number of USTs listed as part of the facility. The wastewater collection and the stormwater collection systems are being improved as part of the Project, and these systems will also be permitted with the Los Angeles County Department of Public Works, the Los

Comment Number	Response
	Angeles Regional Water Quality Control Board and the Los Angeles County Sanitation District to ensure the public is protected.
CBE-5	The lower grade feedstocks will be based on availability; however, there is no current plan to process sewage treatment plant oil and grease. It is true that some feed materials require more hydrogen to process into renewable energy; and therefore, the hydrogen generation unit is sized to be able to provide the amount of hydrogen required to process all the feed materials and the Renewable Fuels EcoFining process unit is flexible enough to utilize the required amount of hydrogen without elevating the risks of runaway reaction hazards and flaring. The new equipment is provided with current safety systems to reduce the operational risks. AltAir has been operating a renewable fuels production facility since 2016 and has not seen runaway reactions, nor has it seen flaring exceeding any refinery operation. GHG emissions are included in the Air Quality Section regarding Greenhouse Gases and have been calculated for the full capacity of the hydrogen generation plant. The feedstocks will be pretreated in a Pretreatment Unit, which is discussed throughout the SEIR. This Pretreatment Unit will allow for the potential variety of feed materials to be processed before it can safely be used as feed in the process units. Routine maintenance of the Pretreatment unit will prevent plugging and disruption to the unit. The SEIR recognizes the potential for additional odors from the nontechnical grade feed materials that may be anticipated for use. For this reason, tanks that are storing feed materials all have carbon vapor control and all vents from the Pretreatment Unit will also have other vapor control (see Section 4.2.4.4 of the SEIR). The Pretreatment Unit will also generate wastewater that requires additional treatment prior to discharge to the permitted LACSD discharge point, which will also have odor control. The wastewater system is discussed in Section 4.10.4.3 of the SEIR. Pretreatment solids disposal is discussed and disclosed with the other waste generation for the Project.
CBE-6	The units being used to produce renewable fuels are disclosed in the Project Description. The original project was approved in 2013 to process with this technology, began operation in 2016 and has been running successfully since then, using a proven commercial technology that meets the Project's product goals and is already in use at the site. Hydrotreating esters and fatty acids (HEFA) does allow refineries to repurpose their crude refining equipment. In AltAir's case, other crude oil processing equipment will not be sustained but replaced with renewable fuels processing equipment. The technology selected allows the refinery to produce both Renewable Diesel and Sustainable Aviation Fuel in support of CARB's Low Carbon Fuel Standards. The Project plans to utilize UOP's EcoFiner process as the major footprint of the Project, which is the same technology utilized at the site successfully since 2016. The technology is flexible to operate in both a jet fuel or renewable diesel production mode. This is the same technology as the existing unit at the site, so the SEIR both identifies and keeps the public and decisionmakers fully aware of the Project's scope. This presents an advantage to other technologies as the site has already optimized the existing process. Unlike a Fischer-Tropsch synthesis, the EcoFining technology does not need to thermally decompose the feedstock and couple the light materials into final product using a methane or similar coupling process, so it can provide fuels of lower CI, utilizing multiple available feedstocks.
CBE-7	Figure 2-3 provides the location of the Marine Terminal where feedstock are planned for delivery and truck loading. Marine facilities are described in Section 2.5.1.1. While not specifically identified, the terminal (operated by Vopak) is an existing liquid import terminal that currently receives similar material, along with petroleum products. The terminal informed AltAir that it could receive the 3 to 4 barges without modification. Based on published information for the Vopak Terminal, the terminal has 4 barge berths; is capable of handling petroleum products, chemicals, and biofuels; has access by barge, pipeline, rail, truck, and vessel; and storage capacity of slightly less than 2.4 million barrels. The terminal has provided barge delivered

Comment Number	Response
	feedstock in the recent past for the Paramount refinery, but had not done so in the baseline period and had not been envisioned for analysis in the 2013 Mitigated Negative Declaration. The 2013 Mitigated Negative Declaration provided for delivery of feedstocks by rail and truck. Therefore, the operation and emissions associated with barge feedstock transport and the additional truck transit from the Port are disclosed in the Air Quality Section of the Draft SEIR to provide a comprehensive analysis of Project impacts. CEQA requires a description of the Project to the extent that impacts can be determined and evaluated. While the exact location of specific tanks may change for the operating facilities, this will not change the level of impacts associated with barge deliveries, truck movements and loading/unloading emissions and traffic impacts, both of which are evaluated in the SEIR.
CBE-8	The Project has no immediate plans to discontinue operation. Demand for diesel and aviation fuel have been shown to be increasing for many years before anticipated decarbonization of industry is expected. Renewable Fuels production will allow for reduced greenhouse gas emissions in support of Federal and State low carbon fuel standards, and reduces the pollutants generated by combustion in trucks and airplanes versus petroleum-based fuels. The refinery has been in operation since the 1930's, so it has long term experience running both as a refinery and a renewable fuels production facility. The refinery equipment that is being repurposed will be thoroughly inspected and upgraded as needed for the Project. New equipment being installed will be specified for safe operation of the process. The Hazards Section of the SEIR discloses the potential risk of ongoing and repurposed operations.
CBE-9	The comment states that the cumulative impacts analysis is unreasonably geographically narrow without justification. The Draft SEIR contains a cumulative impacts analysis within each resource area examined. As required by CEQA, the Draft SEIR defines the relevant area affected in its analysis of cumulative impacts. 14 Cal. Code Regs. §15130(b)(3). The area affected depends on the nature of the impact being analyzed. 14 Cal. Code Regs. §15130(b)(2). The lead agency has discretion in selecting an appropriate assessment area. South of Mkt. Community Action Network v City & County of San Francisco (2019) 33 Cal. App.5th 321, 338 ["SOMA"]; City of Long Beach v. Los Angeles Unified Sch. Dist. (2009) 176 Cal. App.4th 889 ["Long Beach"]. And as required by CEQA, the Draft SEIR provides an explanation as to why the particular geographic areas are selected for the particular analysis. 14 Cal. Code Regs. §15130(b)(3); Long Beach, supra, at 907. "The area within which a cumulative effect can occur varies by issue area. For example, air quality impacts tend to disperse over a large area, while safety impacts are typically more localized. For this reason, the geographic scope for the analysis of cumulative impacts must be identified for each issue area." Draft SEIR at 3-1. The Draft SEIR considered cumulative projects within a two-mile radius in "most cases," and provides the list of cumulative impacts "within two miles of the Project, and other projects that may have an influence on cumulative impacts as appropriate." Draft SEIR at 3-2. The cumulative project list, and the tailored scope of the potential cumulative impacts analysis, is selected so as to not to obscure the potential impacts by diluting them with too large of an impact area. See Ebbetts Pass Forest Watch v Department of Forestry & Fire Protection (2004) 123 Cal. App.4th 1331, 1352 (upholding agency's determination that using overly expansive cumulative impact assessment area for biological impacts would dilute project's impacts to the point that they could not be recognized); East Bay Mun. Util. Dist. v Department of Forestry & Fire Protection (1996) 43 Cal. App.4th 1113, 1128 (agency practice to define assessment area that "was small enough to detect impacts, but not so small as to reduce any impact to insignificance"). The comment suggests that the cumulative projects area should be expanded to include statewide, nationwide and possibly even international projects. This expansion would contravene CEQA's purpose of providing meaningful analysis of potential impacts on the environment. The "discussion of cumulative impacts in an EIR 'should be guided by the standards of practicality and reasonableness.'" SOMA, supra, at 338, citing Long Beach, supra, at 912. Here, in an area as dense as the Los Angeles basin, an area for cumulative impacts analysis would be so broad as to dilute the potential cumulative impacts attributable to the Project.

Comment Number	Response
	Broadening it to consider statewide, national or international impacts in the realm of land use impacts would not be practical nor reasonable under CEQA. The comment also states that the Draft SEIR would place additional burdens on environmental justice communities near the refinery. There are no provisions in the CEQA statute or the CEQA Guidelines requiring a separate analysis of impacts on particular social or economic communities, either in project-specific or in cumulative impact analysis. See Friends of Davis v. City of Davis (2000) 83 Cal.App.4th at p. 1004, 1019 (under CEQA, the question is not whether a project will affect particular persons, but whether it will affect the environment of persons in general), CEQA Guidelines § 15064(e) (economic and social changes resulting from a project shall not be treated as significant effects on the environment). However, the Draft SEIR has included an Environmental Justice chapter at Draft SEIR 4.11 in order to examine potential impacts in particular areas in order to more fully disclose potential impacts to those communities. Consistent with CEQA, the Draft SEIR analyzes the potential impacts of the proposed Project on the aspects of the environment included within the Draft SEIR scope.
CBE-10	As this comment mentions, the U.S. Energy Information Administration predicts a significant increase of renewable diesel production through 2024 on the West Coast to meet the California Low-Carbon Fuel Standard. As also indicated, the overall demand for diesel and aviation fuel is expected to increase, and refinery capacity for producing petroleum-based fuels is declining. The advantage of renewable fuel production is that it can immediately replace petroleum-based fuels and reduce the greenhouse gas emissions of the fuels being consumed by the trucking and aviation industry. This Project would support the growth of the renewable fuels industry to provide a cleaner burning fuel in support of the low carbon fuel standards.
CBE-11	As described in the SEIR Section 1.0 and Section 4.0, the refinery has been operating for almost 90 years. CEQA provides a lead agency the discretion to select a reasonable baseline that is not necessarily existing conditions. As defined in CEQA, Section 15125, "Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions". The selection of a reasonable baseline of the refinery operating at similar levels as to the last few years of crude oil operations is reasonable particularly since the refinery maintains the permits that allow it to operate in that manner and could continue to operate in that manner without additional discretionary action. Factors such as longstanding historical use, legal entitlement, and reasonable projections make the use of the SEIR baseline a reasonably accurate representation of "real" conditions occurring at the Project site. In addition, this environmental document is a Subsequent EIR, and thus the relevant inquiry is whether this Project includes potential impacts not analyzed in the previously analyzed project (the Original Renewable Fuels Project) and, if so, what the incremental impact might be between the previously analyzed project and this Project. In a subsequent CEQA analysis, the previously analyzed baseline has already been established and is not subject to further review. Many of the potential environmental impacts of the Project were already considered in the 2013 MND (and subsequent amendments). When an agency is evaluating a proposed change to a project that has previously been reviewed under CEQA, the agency must apply CEQA's standards limiting the scope of subsequent environmental review. (14 Cal Code Regs §15162; see also Abatti v. Imperial Irrig. Dist. (2012) 205 Cal.App.4th 650, citing Benton v. Board of Supervisors (1991) 226 Cal.App.3d 1467). Under these standards, once an EIR has been certified or a negative declaration adopted for a project, the scope of further CEQA review is limited. As explained in the Draft SEIR at pages 4-2 through 4-5, the Project will have new potentially significant impacts associated with construction activities needed to fully convert the refinery to a renewable fuels facility

Comment Number	Response
	and due to the operation of modified and additional units that were not contemplated in the 2013 Final MND, (e.g., a new hydrogen plant, new renewable fuels unit, a pretreatment unit, and additional rail modifications). Because some of these impacts are potentially significant, the City prepared this Subsequent DEIR. For the purpose of determining whether or not the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent environmental impact report (EIR) or negative declaration (ND) have occurred, the effects of the Project modifications must be evaluated against the effects of the project as initially reviewed and approved. In other words, the "baseline" against which to evaluate the effects of the modifications is the effects of the Original Renewable Fuels Project operating at the maximum capacity analyzed in the December 2013 Final MND. CEQA provides that a lead agency must prepare a subsequent CEQA document for changes to a project only when certain circumstances are met. When circumstances requiring subsequent CEQA review are present, the scope of the subsequent review is limited to those areas not previously examined by the earlier document. In this case, a subsequent EIR was prepared to adequately evaluate the potential environmental impacts of the additional work needed to continue the refinery conversion. As informed by CEQA case law, the EIR should consider the incremental differences between the original project and the modification when evaluating whether the modifications to the original proposal would result in any significant environmental impacts. Accordingly, the analyses in the Draft SEIR distinguish between the Original Renewable Fuels Project baseline versus the basis for comparison with the Project. The original baseline was correctly determined and is not subject to reopening simply because of a subsequent review, given the policies favoring finality of a completed CEQA review. For example, recent case law has confirmed that the original approach to baseline determination was correct. The Association of Irritated Residents v. Kern County case ["AIR"] (2017) 17 Cal. App. 5th 708) sets forth a four-pronged test to guide determination of the baseline for a refinery: that 1) permits and entitlement to operate the refinery in the baseline-year are still in effect; 2) there is actual – not hypothetical - operational history; 3) historical operations have been subject to CEQA; and 4) the refinery could operate at the baseline-year levels without discretionary permits. (AIR, supra, at 728). The 2011 baseline year was established in the 2013 MND and not in this Draft SEIR. To determine the appropriate baseline year, the 2013 MND first evaluated the actual operations during the four-year period prior to the beginning of the CEQA review (2009 to 2012). The activity levels associated with refinery operations varied a great deal during this time period as the refinery conducted crude refining operations and operated as a terminal during this timeframe. Peak activities occurred in 2009 which saw the highest number of trucks, railcars, employees, electrical purchases, wastewater discharge, and generation of spent catalyst. To avoid artificially inflating the baseline, 2011 was used as the baseline year as it was the most representative year when crude refining activities where being conducted. This is consistent with the approach validated in AIR, where the baseline year was determined after considering several years of refinery throughput and establishing that the selected baseline year was representative of the actual refinery operations (AIR, supra, at 727-728).
CBE-12	Pipeline emissions are detailed in the SEIR for the construction of the pipeline. Additional emissions associated with the natural gas pipeline operations would be nominal compared to the emissions at the refinery and would occur primarily at the refinery (pigging), whose emissions are accounted for in the SEIR. Natural gas does not contain appreciable levels of VOCs and no NOx would be generated as part of the pipeline operations, so the South Coast AQMD would not get involved in permitting of the pipeline emissions. There would be nominal methane emissions from component leaks along the pipeline, but these fugitive emission leaks would be very low, as the gas would be odorized and even small leaks would be identified quickly, as well as the gas company frequently inspects for leaks. Therefore, these fugitive emissions are considered incorporated into the estimates of fugitive emissions from the refinery operations. Periodic use of

Comment Number	Response
	the natural gas pipeline safety blowdown equipment could generate emissions, but these emissions would be similar if not less than the emissions generated as part of emergency flaring activities at the refinery and are therefore considered included in the analysis. The Project does not install any new product pipelines, so no additional length of pipeline that could need maintenance would be installed as part of the Project. Therefore, emissions associated with operation of the product pipelines would be the same as the existing pipelines and does not require further analysis. The new natural gas pipeline will terminate at the refinery. Maintenance inspection pigging is expected to push the natural gas to the facility for use in the combustion devices. The combustion emissions associated with the facility combustion devices were analyzed at full capacity. Therefore, no additional emissions from maintenance of the natural gas line would be expected since once the line is removed from service, equipment at the facility would be offline awaiting the reactivation of the natural gas line. The combustion units were analyzed at continual operation and therefore, overstated the anticipated actual emissions. As explained in response to CBE-2, the use of the renewable fuels is not in addition to the current diesel fuel demand. Therefore, the emissions impacts associated with combusting renewable fuels produced by the Project would be the same, if not lower, than current emissions. Some studies (CalEPA), indicate burning renewable fuels in trucks and planes reduces the combustion emissions. Diesel emissions may decrease by 10 percent for NOx and VOCs, 5 percent for CO, and 30 percent for PM. SOx emissions may drop by 98 percent because unlike crude oil, renewable feedstocks do not contain detectable amounts of sulfur. As indicated in the SEIR, other studies indicate that emissions levels at end use may not change, therefore, no credit was taken for emissions changes during end use of renewable fuels.
CBE-13	As shown in Table A-8 of Appendix B on pages Appendix B Part 2-88 through Appendix B Part 2-102, storage tanks that will be permitted to hold multiple commodities including petroleum products including diesel and gasoline have been evaluated using the appropriate properties to calculate VOC emissions from the storage tanks using the latest U.S. Environmental Protection Agency (EPA) and South Coast AQMD-approved calculation methodology. The calculations are provided in Attachment B of Appendix B on pages Appendix B Part 2-283 through Appendix B Part 2-568. The comment references two draft EIRs regarding odor control of feedstock storage tanks. Neither of those EIRs discuss odors from volatile organic compounds, but instead address odor control from the storage tanks. The same odor control methods (i.e., nitrogen blanketing and venting to carbon control systems) are employed on existing feedstock storage tanks and will be employed as part of the Project for additional feedstock storage tanks (see Table A-8 of Appendix B on pages Appendix B Part 2-88 through Appendix B Part 2-102). The expected VOC emissions from the processed feedstocks have been included in the fugitive emissions calculations for the piping in the various process units, storage tanks, and loading racks. Appendix B of the Draft SEIR provides detailed tables of the emissions accrued for the Project. The air emission calculations were thoroughly reviewed by the South Coast AQMD in consultation with the City prior to publication of the Draft SEIR. The Fluxsense study was commissioned to characterize the emissions in the South Coast Air Basin and to assess the uncertainties associated with different optical techniques through side-by-side measurements of actual sources. This information has since been used in the development of monitoring requirements for large refineries under South Coast AQMD Rule 1180. The approved and accepted emission calculation methodology employed for permitting storage tanks is U.S. EPA AP-42 Chapter 7. Optical sensing techniques are not approved for emissions estimations. Therefore, the emission calculations presented in the

Comment Number	Response
	Draft SEIR, which adhere to the approved emission estimation methodology, are the appropriate calculations to represent the expected emissions from the Project. It should be noted that unlike petroleum products, renewable fuels do not contain benzene. While some storage tanks at the AltAir site would contain petroleum distillates for blending. The renewal fuels storage tanks would not contain benzene and other aromatic hydrocarbons. Therefore, the Fluxsense report conclusions would not be representative of the emissions at the AltAir site.
CBE-14	As discussed in the response to CBE-1, process impacts of varying hydrogen requirements for differing feed material was considered with the sizing of the Hydrogen Generation Unit and the emissions of the Hydrogen Generation Unit are estimated at full capacity. This is disclosed in the Project Description and the discussion of the use of hydrogen in renewable fuels operation versus crude oil operation provided in Section 2.3.3 of the Draft SEIR. Process impacts of varying pretreatment requirements for differing feed material was considered in the development of the Pretreatment Unit capacity. The Project anticipates receiving a portion of pretreated material; however, to be conservative, the Pretreatment unit is sized to treat the full capacity of the renewable fuels production process. The Hydrogen Generation Unit planned for the Project will use natural gas, as well as renewable gases from the Project production for its feed material. The Carbon dioxide emissions from the renewable gases are biogenic in nature and do not add to the overall carbon balance in the atmosphere. The natural gas feed material does generate carbon dioxide; however, the renewable fuels that are produced will reduce the carbon dioxide impact of each gallon of fuel combusted in the trucks and planes that use them. This is the goal of the Low Carbon Fuel Standard for which this Project is supporting. Flaring is further discussed in Section 4.2, page 4.2-28; however, AltAir has not experienced flaring in exceedance of a refinery operation during its renewable fuels operation since 2016.
CBE-15	The DSEIR and the air emissions calculations, modeling assessments and mitigation measures were extensively reviewed by the South Coast AQMD. Mitigation measures proposed are identical to those proposed and implemented by the South Coast AQMD on other CEQA projects as described in EIRs on the South Coast AQMD website that have been reviewed and certified (http://www.aqmd.gov/home/rules-compliance/ceqa). The use of ERC and NOx RECLAIM is used in this SEIR and previous, certified EIRs as acceptable mitigation and allows for the reduction of emissions on a regional basis to achieve the goals of cleaner air and reduced ozone impacts. Note that the ERC are not used to estimate localized impacts associated with activities at the refinery and the potential impacts to nearby residents: they are only used to assess the impact to regional, basin-wide emissions. The extensive involvement of the South Coast CEQA and permitting staff in the review and acceptability of the air emissions calculations and the DSEIR and mitigation measures ensures that all applicable mitigation measures have been utilized. ERCs are required as part of the permitting process for the Project and, therefore, are part of the Project. Compliance with applicable regulations is a fundamental presumption of CEQA and has been confirmed in multiple lawsuits (e.g., Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 416; Save Our Peninsula Committee v. Monterey County Bd. of Supervisors (2001) 87 Cal.App.4th 99, 141; and Sierra Club v. Tahoe Reg'l Planning Agency (E.D.Cal. 2013) 916 F.Supp.2d 1098, 1140.) In order to obtain the South Coast AQMD permits for the Project, ERCs must be provided by the Applicant. Therefore, the use of ERCs as part of the Project, and not mitigation, is appropriate. The Project will be subject to Rule 1109.1. This is accounted for in the NOx controls and emissions anticipated in the Project as discussed in the Air Quality Section. The Project, in fact, will be in compliance

Comment Number	Response
	with Rule 1109.1 prior to the required compliance schedule in the rule because it is ensuring all of the rule combustion devices will have controls that meet rule requirements during Project construction.
CBE-16	The SEIR does not rely on the mitigation measure AQ-2b in order to reduce emissions to below the significance levels. In fact, due to the uncertainty of the mitigation measure and the ability of the measure to achieve defined reduction levels, no credit is taken for the mitigation measure and the impacts remain significant and unavoidable. However, the mitigation measure may provide some community benefits in terms of cleaner City-owned vehicles and increased electrical vehicle infrastructure and was therefore retained in the FSEIR. The basis for the SEIR use of 200 feet is the exceedances of the NO_2 localized modeling thresholds and the distance to the peak receptors, as discussed under impact AQ-2b. Additional text has been added to the FSEIR to clarify the basis for the distribution of air filters and an additional figure has been added to the FSEIR indicating the areas that are projected to experience threshold exceedances of the State and Federal thresholds. The distances which VOCs and the associated pollutants would travel, and the potential impacts are quantified in Appendix B Part 1 detailing the localized modeling, which takes in to account the meteorology and the dispersion of pollutants downwind under a 5-year data set of meteorological data, as prescribed by the South Coast AQMD. Note that the exceedances of thresholds only apply to NO_2 and only during the construction period. No other exceedances of pollutants occur during construction and no exceedances are projected to occur during operations. Therefore, the distribution of air filters and maintenance of school filters would occur only during the construction period. CEQA requires that there be a nexus for mitigation and, given that localized impacts would only occur during construction, this has been used as the basis for the air filter program. The Project will offer air filtration units to neighbors of the facility as part of mitigation. It is expected that these units would have a functional life after the completion of the construction, which would reduce exposure to NOx emissions in the vicinity of the facility longer than the construction impacts it was designed to mitigate. The conditional use permit is expected to establish a 60-day average limit for the number of trucks to 300, which would prevent the peak number of 540 trucks from occurring on a consistent basis. This condition has been added to the alternatives discussion in the FSEIR. The peak day would remain the same, but given that truck traffic is dictated by market conditions, there would be a reduction in emissions over the average period.
CBE-17	The DSEIR and the air emissions calculations, modeling assessments and mitigation measures were reviewed by the South Coast AQMD. Mitigation measures proposed are identical to those proposed and implemented by the South Coast AQMD on other CEQA projects as described in EIRs on the South Coast AQMD website that have been reviewed and certified (http://www.aqmd.gov/home/rules-compliance/ceqa). Note that the allowance for different engine types is applicable only to the construction period, as construction equipment is generally more difficult to find that complies with the most recent standards. During the operational period, the mitigation measure is less flexible. The California requirements for newer construction trucks than 2010 have a number of exemptions, including lower mileage trucks and some construction trucks, so not all vehicles are required to achieve model year 2010 or newer by 2023. But most trucks would be required to comply by 2023 as indicated. Note that the requirements in the SEIR for 2010 trucks only applies to construction trucks. Operational trucks require the use of 2017 or newer trucks.
CBE-18	The lower leak rate and detection limits described by the SEIR are proposed by the Applicant as Applicant proposed measures and part of the Project Description and are utilized throughout the air emissions

Comment Number	Response
	calculations. These measures have been reviewed by the South Coast AQMD and incorporated into the permitting process. These measures are therefore not included as mitigation measures as they are already proposed by the Applicant. See Section 4.2.4 introductory text. Zero emissions trucks and offroad equipment are generally not commercially available at this time (see WSJ, Nov 9, 2021) although they are being developed in a range of demonstration projects. The refinery will be generating fuel gas from the renewable feedstocks and will have a need for the use of the "waste" gas in the process, so the use of electric heating systems would be inefficient for the process.
CBE-19	The SEIR utilizes the local agency responsible for implementing air quality permits, notices of compliance and notices of violation and complaints from the public related to air quality. The South Coast AQMD also manages the Federal Title V permitting system. Therefore, the local agency is the appropriate location to evaluate compliance history of the facility. Compliance data was acquired for 20 years of refinery history, including the crude refinery as well as the refinery operating as a smaller, renewable fuel facility. AltAir was subject to a CARB settlement in 2020 due to a clerical error occurring several years prior that misstated the total gallons of gasoline produced and overestimated the emissions generated. The error was resolved satisfactorily with the agency.
CBE-20	The new flare and flare system are discussed in Section 2.5.1.2 and the location is shown in Figure 2-2. The emissions associated with the new flare are accounted for in the emissions calculations and would receive a permit to operate from the South Coast AQMD. The new flare would be required to comply with API 521 defining safe distances from receptors. The new flare would be located more than 550 feet from the nearest refinery fence line. Hazards associated with the new flare would be less than the potential hazards associated with accidental releases described in Section 4.4 as it would be required to comply with thermal radiation limit requirements as a part of API standards. The flare and emergency operations would be a part of the South Coast AQMD permitting requirements and would be managed by the permit notification and throughput limits associated with these permits. Equipment maintenance would adhere to standard practices and the refinery has been operating as a renewable fuels facility with the same feedstocks and these have not produced any know maintenance or release issues during that period. The significance criteria are based on the hazards presented to the community, as defined in CEQA Guidelines Appendix G, by the refining process and the SEIR demonstrates that these hazards would not change, and actually would decrease slightly in magnitude, with the Project. The Project is installing an additional flare to improve the safety of the operation due to the installation of the hydrogen plant and the additional units. It is sized to jointly accommodate relief loads from all the refinery units following construction and includes a second vapor recovery system to recover gases so that flaring only occurs during an emergency. This is discussed in Section 4.2, page 4.2-28. Flare design covers process malfunctions such as unit overpressures, fires, and power failures. Flare permitting and AQMD Rule requirements require controls and flare minimization plans, and a new Flare, flare vapor recovery system, as well as the new process units, will require BACT, all of which will serve to minimize flaring. Any flaring from the unit would continue to be monitored and in compliance with South Coast AQMD guidelines and the governing South Coast AQMD flaring plan. It is appropriate for the Draft SEIR to assume that the Project will comply with applicable rules and regulations. Save Our Peninsula Committee v. Monterey County Bd. of Supervisors (2001) 87 Cal.App.4th 99, 141 ("Furthermore, we must presume and expect that the County will comply with its own ordinances,…"). Additionally, as mentioned in the response to CBE-5, some of the lower grade feedstocks require more hydrogen to process into renewable energy; and therefore, the hydrogen generation unit is sized to be able to

Comment Number	Response
	provide the amount of hydrogen required to process all the feed materials, and the Renewable Fuels EcoFining process unit is flexible enough to utilize the required amount of hydrogen without elevating the risks of runaway reaction hazards and flaring. The new equipment is provided with current safety systems and redundancy, i.e., spare standby equipment such as pumps and compressors, and duplicate instrumentation to reduce the operational risks of shutdown and flaring due to loss of this critical equipment. The reactors are equipped with "liquid quench" systems that are designed to keep the process within acceptable temperatures; in the event of a major upset as contemplated by the Draft SEIR Hazards analysis (see, generally, p. 4.4-30), such as an operating temperature exceeding the equipment safety limits, the unit is equipped with a Safety Instrumented System to safely shut down the unit and avoid an excessive temperature increase. Unlike other gas quenched hydrogenation systems such as those referenced in connection with conventional crude oil refinery operations, liquid quench systems included in the EcoFining process have been very reliable both on the existing unit that has been in operation for over five years and the Project's proposed unit described in the Draft SEIR. AltAir has been operating its existing renewable fuels production facility since 2016 and has not seen runaway reactions, nor has it seen flaring exceeding any refinery operation. GHG emissions are included in the Air Quality Section regarding greenhouse gases and have been calculated for the full capacity of the hydrogen generation plant, thereby including any variability in hydrogen requirements for a varying feedstock. Additionally, to minimize these variations, the feedstocks will be pretreated in a Pretreatment Unit, (discussed throughout the SEIR). This Pretreatment Unit will allow for the potential variety of feed materials to be processed and blended so it can safely be used as feed in the process units.
CBE-21	The SEIR presents a number of pipeline release scenarios associated with both the baseline operations, which currently has a natural gas connection to the refinery, and the Project operations, which would install a larger natural gas connection to the refinery entering the refinery from the south. See Figure 2-2. The baseline scenario is discussed in Section 4.4.1.7 and presented in Table 4.4.9. Impact distances for a natural gas pipeline release associated with the baseline operations are estimated to be as high as 129 feet for a torch fire. For the Project, the modeling was performed for the larger sized pipeline and are presented in Section 4.4.4.2 and are discussed in the text under Natural Gas Pipeline Hazards heading. Impact distances are indicated to range as far as 321 feet, primarily due to the larger pipeline diameter of the new natural gas pipeline. For pipelines, beyond a certain length of pipeline, the impacts are essentially the same regardless of length as the pressure drop of the gas through the long pipeline are large enough that the flow rates drop substantially for pipelines longer than about 2,000 feet. Therefore, 2,000 feet was used as a representative distance to estimate the largest thermal impact. In addition, thermal impacts are primarily associated with the initial release from the pipeline and the high flow rates associated with the early period of a release, which are a much stronger function of the diameter of the pipeline and the pipeline pressure than the length of the pipeline. PHMSA does not provide pipeline failure rate data on biofuel pipelines as there are very few biofuel pipelines operating in the U.S. Therefore, liquid pipelines are used to provide information on the numbers of pipeline failures in California and the U.S. Gas transmission pipeline data is also shown in the SEIR. Additional information on the number of fatalities and injuries associated with natural gas transmission pipelines is added to the FSEIR based on PHMSA data for the U.S and for California. Note that the SEIR identified the operation of the natural gas pipeline as a significant and unavoidable impact due to the hazards presented to the public.

Comment Number	Response
CBE-22	The SEIR identifies the hazardous material inventories for both the baseline and the Project. The Hazardous Materials Business Plan information was utilized for the baseline hazardous materials inventories for the years that it was available. 2013 is considered to be representative of the inventories during the baseline years, particularly as the main hazards associated with the refinery, the large tanks storing gas liquids, have been present during the entire period. The baseline hazardous material inventory are presented in Table 4.4.2 and the anticipated Project inventories are presented in Table 4.4.12. Note that the baseline for the Project is defined as the 2011 refinery operating as a crude oil refinery. Substantial evidence is presented in the SEIR through the use of scenario release modeling for a number of potential scenarios and hazard zones, which would marginally decrease the hazards associated with the Project. A large number of scenarios were examined in the SEIR, for both the baseline and the Project, but the focus of the analysis was on scenarios that could reach areas outside of the refinery. A number of other scenarios could occur, including releases from catalysts or pipeline leaks, that are incorporated into the range of release scenarios associated with the Project. Hazardous material handling is regulated by OSHA and the CUPA for onsite management, DOT for transportation, RCRA regulations and additional California regulations for proper disposal. Training is provided for the onsite employees and contractors and only registered and permitted carriers are used for transportation and disposal. It is appropriate for the Draft SEIR to assume that the Project will comply with applicable rules and regulations. Save Our Peninsula Committee v. Monterey County Bd. of Supervisors (2001) 87 Cal.App.4th 99, 141 ("Furthermore, we must presume and expect that the County will comply with its own ordinances,…"). U.S. EPA considers spent catalysts to present a hazard, and therefore, it is managed on-site, in traffic, and at the recycling facilities. When catalyst needs to be regenerated or disposed, it is removed from reactors under nitrogen purging to prevent heat reaction that might occur in open air. It is stored in airtight containers, also under nitrogen purge so that the catalyst travels safely to a reclaiming facility for safe reclamation. Although spent catalyst can be considered toxic and pyrophoric if mishandled, these hazards are eliminated by unloading materials under an inert environment and nitrogen purging the bins in which the spent catalysts are stored. Catalyst is replaced in the reactors during normal turnaround periods which are normally about once per year and are only on-site for a limited amount of time during characterization for shipment. The operating reactors contain catalyst specified for the operation of that unit. Some catalyst is changed out every year and some operate for several years before regeneration or disposal. Spent catalyst is not subject to fires when stored in a nitrogen (inert) environment.
CBE-23	Soil contamination does exist on-site, as discussed in the SEIR Section 4.4.1.8. The excavation of these contaminated soils, if not managed, could allow for the release of air contaminants causing potential impacts. The South Coast AQMD Rule 1166 establishes requirements to control the emission of VOCs from excavating, grading, handling, and treating soil contaminated from leakage, spillage, or other means of VOC deposition. Rule 1166 stipulates that any parties planning on excavating, grading, handling, transporting, or treating soils contaminated with VOCs must first apply for and obtain, and operate pursuant to, a mitigation plan approved by the Executive Officer prior to commencement of operation. BACT is required during all phases of remediation of soil contaminated with VOCs. Rule 1166 also sets forth testing, record keeping and reporting procedures that must be followed at all times. The Applicant will be submitting a Rule 1166 plan as this is a required plan under the existing regulations. Additional measures are not necessary. The SEIR discusses these requirements in Section 4.4.2.3.

Comment Number	Response
	The South Coast AQMD has requirements under Rule 403 for best available dust control measures that apply to any active operation capable of generating fugitive dust. As an ongoing operation and during construction, Rule 403 applies to the facility. Dust control measures from Rule 403 also apply to the Project as they apply to the current operations. The required dust control measures include watering the site three times a day, which was included in the construction emission calculations. Particulate emissions, which include dust, from construction were calculated based on the amount of soil disturbance and found to be below the localized significance threshold. Therefore, no significant offsite impacts from particulate (i.e., dust) are expected with adherence to Rule 403 watering requirements.
CBE-24	Although protection of worker safety is of the utmost importance, the scope of CEQA is on the potential environmental impacts to the public and the environment. Various other regulations, such as OSHA, address worker safety requirements. The risk to onsite workers is discussed in section 4.4.4.2, page 4.4-34, where, as mentioned in CBE-23, "on-site workers are provided with protection" because they have access to safety equipment, participate in safety exercises, and undergo professional training to safely work around the potentially hazardous conditions that exist within an industrial facility. OSHA and Cal-OSHA rules and regulations also are designed to ensure a safe working environment for industrial and construction workers. The hazards analysis presented in Section 4.4 of the Draft SEIR and Appendix C provide a comprehensive evaluation of the hazard impacts on the environment surrounding the facility.
CBE-25	See response to comment CBE-11. The GHG analysis was reviewed for the detailed calculations and SEIR draft sections by the South Coast AQMD and complies with their requirements for a CEQA analysis. Regardless of the year chosen for the baseline, the GHG emissions increase over the baseline would be primarily due to certain transportation increases (marine vessels, out of state railroad, etc.) which may not be covered by existing programs to address GHG, such as cap-and-trade. This increase would be the same regardless of the baseline chosen for the Project. All other emissions: from trucks using diesel fuel supplied by cap-and-trade compliant vendors or natural gas combustion from cap-and-trade compliant vendors (the gas company). The 2013 Mitigated Negative Declaration analyzed the change in GHG emissions associated with the Original Renewable Fuels Project that reflect the operational emissions that occurred in 2016. As explained in response to comment CBE-11, as a Subsequent EIR, the analysis is a continuation of the conversion of the refinery and as such is compared to the incremental change from the previous analysis. Therefore, the comparison to the operations in 2011 as modified by the 2013 Mitigated Negative Declaration is appropriate.
CBE-26	The refinery GHG emissions associated with the production of renewable fuels is a function of a number of different issues, as are the emissions associated with refining fossil fuels. Each of these GHG emissions calculations are incorporated into the CARB low carbon fuel standard (LCFS) program, which examines lifecycle issues associated with transportation fuels, including indirect land use changes and refining energy requirements. The detailed air emissions calculations in Appendix B incorporate the GHG emissions associated with refining renewable fuels associated with the process detailed in the SEIR and provides full disclosure for the range of emissions that are generated, as well as mitigation measures to reduce the potential impacts. The Project would continue the original project started in 2013 to manufacture renewable fuels in compliance with CARB's LCFS which reduces GHG emissions by reducing the carbon intensity of transportation fuels used in California. The LCFS is designed to encourage the use of cleaner low-carbon fuels in California, encourage the production of those fuels, and, therefore, reduce GHG emissions. The LCFS is performance-based and fuel-neutral, allowing the market to determine how the carbon intensity of California's transportation fuels will be reduced.

Comment Number	Response
	Carbon intensities are calculated under the LCFS on a full life cycle basis. This means that the carbon intensity (CI) value assigned to each fuel reflects the GHG emissions associated with that fuel's production, transport, storage, and use. In addition to these direct effects, CARB has identified land use change as an indirect effect that has a measurable impact on GHG emissions. A land use change effect occurs when demand for a crop-based biofuel brings non-agricultural lands into production. When new land is converted, such conversions release the carbon sequestered in soils and vegetation. The resulting carbon emissions constitute the indirect land use change (iLUC) impact of increased biofuel production. Based on published work by academics and researchers studying land use change, CARB concluded that the land use impacts of crop-based biofuels are significant and must be included in LCFS fuel carbon intensities. In 2015, CARB prepared a report for external scientific review titled: Calculating Carbon Intensity Values from Indirect Land Use Change of Crop-Based Biofuels. The evaluation of iLUC is part of the LCFS life cycle analysis for feedstock. As Such, this issue can be addressed appropriately as part of the LCFS update. To estimate iLUC emissions of crop-based biofuels that will be regulated under the LCFS, CARB selected a global economic model developed by Purdue University called Global Trade Analysis Project (GTAP). GTAP modeling provides an estimate for the amounts and types of land across the world that is converted to agricultural production as a result of the increased demand for biofuels. In the iLUC analysis, the GTAP model was modified to account for biofuels and their co-products. This model, termed GTAP-BIO, represents all sectors of the global economy (in an aggregated form), and interactions among various sectors and resources are represented using various internal and external parameters. GTAP employs the 2004 world economic database as the analytical baseline. This is the most recent year for which a complete global land use database exists. The model is then "shocked" by increasing biofuel production by an appropriate volume. To meet this new requirement, the model allocates existing resources and also accounts for additional production of crops, ultimately ensuring a new global equilibrium is achieved. The changes in land uses (classified as forestry, pasture, cropland, and cropland pasture in the model) computed by the model are then used in combination with a carbon emissions model called Agro-Ecological Zone Emission Factor (AEZ-EF) model to estimate the CO_2-equivalent emissions from land-use change. The AEZ-EF model utilizes soil and biomass carbon stock data for different land types and regions of the world and calculates emission factors for land conversions. The model estimates the CO_2-equivalent GHG flows when land is converted from one type to the other (e.g., forest to cropland). The GHG flows are summed globally and divided by the total quantity of fuel produced to produce a value in grams CO_2e per megajoule of fuel (g CO_2e/MJ). Given the likely range of values for parameters that have the largest influence on model outputs, CARB used a 30-scenario approach that used different combinations of input values (within the range derived from literature review and expert opinion) to estimate output iLUC values for each set of input values. The output iLUC values (CIs) from all the scenario runs was then averaged and proposed to be used as indirect CI for that specific biofuel in the LCFS regulation. For this analysis, CARB analyzed iLUC emissions for corn ethanol, sugarcane ethanol, soy biodiesel, canola biodiesel, palm biodiesel, and sorghum ethanol. The table below summarizes the iLUC values for all six biofuels analyzed by CARB for the LCFS regulation. **Biofuel** | **iLUC (gCO_2e/MJ)** Corn Ethanol | 19.8 Sugarcane Ethanol | 11.8 Soy Biodiesel | 29.1 Canola Biodiesel | 19.4

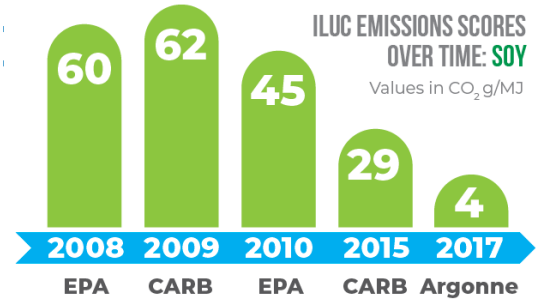
<table>
<tr><th>Comment Number</th><th>Response</th></tr>
<tr><td></td><td>
<table>
<tr><td>Sorghum Ethanol</td><td>14.5</td></tr>
<tr><td>Palm Biodiesel</td><td>71.4</td></tr>
</table>

Note that fossil fuel gasoline has a GHG intensity of 99.78 gCO_2e/MJ. Sugarcane ethanol has the lowest iLUC value, while palm biodiesel has the highest iLUC value. All of the iLUC values for the six biofuels analyzed for the LCFS have a lower GHG intensity than fossil fuel gasoline.

Based on the iLUC analysis, CARB concludes that the assumptions and input parameters used in the GTAP-BIO and AEZ-EF models to estimate iLUC for biofuels are reasonable and the models were applied appropriately under the LCFS. The LCFS program accounts for iLUC impacts in its models, and the Project would produce fuels in line with the LCFS. Therefore, iLUC impacts that would result from the Project would be accounted for by the LCFS program.

The concerns of renewable diesel plants driving up demand for bio feedstock that could negatively impact land use and increase carbon footprint are based on two assumptions.
1. There is limited availability of waste oil and animal fats, thus driving up significant demand for food-crop oils such as soybean oil.
2. Demand for food-crop oils would have outsized impact on agricultural or forestry resources.

Regarding the first assumption, there is sufficient waste oil and animal fats to supply over 260 MBPD of renewable diesel production. (IHS 2019). This would nearly displace all the CARB diesel in CA. As for the iLUC issue, subsequent data-based research found the early conclusions that food-crop oil has a high carbon footprint have been overstated. The assumptions that increased demand for food-crop oil would result in deforestation were faulty.

Updated GTAP model shows that uniform vegetable substitution (meaning that palm oil is not the only soybean oil substitute as originally assumed) actually reduces the stated carbon footprint of increasing demand for soybean oil. In fact, this model shows that U.S. biofuels policy had a negligible impact on Malaysia and Indonesia (M&I) deforestation. M&I deforestation is often cited as the main concern with increasing soybean oil demand. That turns out not to be the case (Taheripour).

All these findings are continually updated in the GTAP model. CARB's last update of the GTAP model was in 2015 that used 2009 data. As the figure shows above, each refinement of economic modeling has resulted in the recognition that the original concern of land use impact from food-crop oil was overstated.</td></tr>
<tr><td>CBE-27</td><td>The detailed emissions calculations for GHG emissions are discussed in the SEIR in Section 4.3 and tabulated in Table 4.3.2. Table 4.3.2 indicates that the GHG emissions from cap-and-trade do not include GHG emissions from ships and rail sources which might obtain their fuels from outside California.

Cap-and-trade is an established program in California to reduce GHG emissions from over 80 percent of the sources in California over time. New sources are required to obtain allowances for the program in order to emit GHG emissions, as the refinery under the Project would be required to do. Section 4.3.2.3 discusses state programs including cap-and-trade.</td></tr>
</table>

Comment Number	Response
	Compliance with regulatory requirements is a fundamental presumption of CEQA. Mobile source emissions calculations are presented in detail in Appendix B of the Draft SEIR (see summary Table 3 in Appendix B on pages App B Part 2-14 and App B Part 2-15 and the detailed emissions calculations on pages App B Part 212 through App B Part 2-82). As explained in the Draft SEIR on pages 4.3.-17 and 4.3-18, only the ship and locomotive emissions are not subject to AB 32 cap and trade requirements. The GHG significance threshold is not used for the purpose of regulating GHG, but instead is used for determining CEQA impacts and therefore, the South Coast AQMD Interim GHG Threshold is a valid CEQA significance threshold. The City has the discretion of establishing the significance thresholds for CEQA. Therefore, reliance on an existing threshold from a resource agency that has established a quantitative threshold is appropriate and used in numerous other CEQA documents in the South Coast area.
CBE-28	CEQA does not require that all objectives of the project be met in order for an alternative to be considered feasible, only that most of the project objective be met. The alternatives provide a wide range of alternatives that could feasibly achieve the underlying objectives of the Project, which is to produce renewable fuels and low carbon fuels as part of the LCFS. Note that the SEIR examines other means of producing hydrogen, as well as continued use of the hydrogen pipelines, and does not limit the alternatives to "only hydrogen on-site". However, the use of offsite hydrogen would require transportation of hydrogen to the site which could increase hazards and introduce new significant and unavoidable impacts. As CEQA requires, the objectives describe the underlying purpose of the Project. 14 Cal Code Regs §15124(b). Moreover, a lead agency has broad discretion to formulate project objectives. California Oak Found. v Regents of Univ. of Cal. (2010) 188 Cal. App.4th 227, 276 ("CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives"). Project objectives guide the selection of alternatives to be evaluated in the EIR, and the alternatives considered should be able to "feasibly attain most of the basic objectives of the project" while reducing or avoiding any of the project's significant impacts even if they would impede attainment of project objectives to some degree or be more costly. 14 Cal. Code Regs. §15124(b); 14 Cal. Code Regs. §15126.6(a),(b). The Draft SEIR explains that the Relocated Hydrogen Plant Alternative was considered but rejected from inclusion for further analysis as an alternative because it would be likely to result in increased significant impacts, including increased hazards from high pressure pipeline transportation. Draft SEIR at 5-9. Therefore, the Relocated Hydrogen Plant Alternative would not achieve several Project objectives and would not necessarily reduce or avoid the Project's significant impacts, particularly when compared to the alternatives selected, and it was thus not carried forward for further evaluation.
CBE-29	The alternative for a reduced refinery throughput examines the potential for eliminating the need for a natural gas pipeline, which produces the potential for a significant impact. However, the amount of reduction in size of the reduced refinery alternative in order to eliminate the natural gas pipeline is substantial and would effectively be similar to the No Project Alternative. This would clearly not meet the objectives of the Project and it was therefore eliminated. Please see Section 5.3.1.1 of the Draft SEIR. The Reduced Throughput Alternative would reduce the planned production by over 90 percent. Although this would avoid most significant impacts of the Project, it would not meet the Project objectives and it is not economically feasible. Under CEQA, "feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, § 21061.1.) The "feasibility of the alternatives must be evaluated within the context of the proposed Project. 'The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.' " (Uphold Our Heritage v. Town of Woodside, supra, 147 Cal.App.4th at p. 599; Citizens of Goleta Valley v. Board of Supervisors (1988) 197 Cal.App.3d 1167, 1181.)

Comment Number	Response
	A fundamental goal of the Project is to provide renewable fuels which reduce air and truck emissions and meet the requirements of CARB's LCFS program, thereby reducing dependence on fossil fuels. Renewable fuel plays an important role in California's goals to achieve carbon neutrality by 2045 because it contributes to the reduction of GHGs within industries that are difficult to decarbonize, such as heavy industry and aviation. As explained in the Draft SEIR, the goals of the LCFS include reducing the carbon intensity of transportation fuels. Minimizing the refinery capacity would not achieve the fundamental goal of the Project to develop renewable fuels, rather, it would entirely change the basic nature of the Project. Thus, a minimal operating alternative is not an appropriate alternative to consider beyond the initial screening.
CBE-30	Green hydrogen is rapidly becoming more available. However, the availability of green hydrogen in the area is still very limited and speculative. Projects involving the importation of green hydrogen into the ports is possible, but yet there are a number of safety and permitting hurdles which would have to be addressed and at this time it continues to be speculative. The SEIR based the analysis of different hydrogen technologies on the Department of Energy (DOE, Office of Energy Efficiency & Renewable Energy, 2021), studies. Electrolysis of water to produce hydrogen would require very large amounts of electricity, the production of which would require natural gas anyway, and therefore the efficiency of the process would be compromised. The SEIR includes a detailed comparison of the options for different hydrogen generation techniques. Different technologies are currently progressing, such as biomass-based systems as discussed in the SEIR, but these are not commercially available at this time and their use would be speculative. Note that even with the use of natural gas to produce hydrogen, the renewable fuels produced as part of the Project would have large reductions in lifecycle GHG emissions, which are needed in order to achieve climate change goals established by the State of California. The baseline electrical use is based on electrical demand as part of the baseline operations.
CBE-31	Determination of different pipeline routes is inherently speculative as discussions with landowners and other uses, such as the MTA WSAB project, could render the alternative not feasible. However, the exercise is included in the SEIR in order to provide full disclosure and to examine whether any other routes might not have those limitations. As the area for the Project is highly urban, few of the routes provide for substantial advantages. However, prior to choosing a route, many factors were considered for each viable option. Factors including but not limited to constructability, traffic, ease or difficulty for constituents throughout the construction process, Gas Handling considerations, In-line inspection and maintenance, amongst other things. In particular, the following options were considered and discarded as explained below. OPTION – L765 Tap Somerset Blvd Option to tap into existing L765 in Compton and run approximately 3 miles of 16" extension east of tap location crossing 710 FWY, LA River drainage channel and Pacific Electric Railway. This option was deemed less favorable due to constructability challenges, operational constraints and difficulties associated with a Horizontal Directional Drill (HDD) across the Los Angeles River drainage channel (ACOE 12-18 months) and the 710 FWY. To cross both the Los Angeles River and the 710 FWY requires approximately 1,000-foot drill making pipe stringing difficult without impacting traffic along Somerset and Atlantic or impacting Clinton Elementary School's ingress/egress. In addition, Somerset Blvd is a narrower street with fewer lanes resulting in more impactful traffic control plans and decreased pipeline production rates. This proposed pipeline extension would also require In-line inspection, due to the higher operating pressure from Line 765. In-line inspection would be very challenging since the refinery is a single point of receipt for the large volume of gas that is being pushed ahead of the inspection tool. . OPTION – SL 30-15 Tap at Woodruff

Comment Number	Response
	This option would tap into existing SL 30-15 in Woodruff Ave and Washington St and run approximately 1.7 miles of supply line traversing West through a major residential area along Somerset Blvd. This option, which was originally considered, identified the closest source of high-pressure service from a Distribution Supply Line during the planning for tap location and capacity verification. A tap location was identified approximately 1.65 miles to the East of the refinery to be served from SL 30-15 and was analyzed for capacity. A 1.71 mile line extension would travel along Somerset Blvd from the intersection of Woodruff and Somerset. The analysis concluded that the supply line had insufficient natural gas capacity to support any pipe size necessary to meet the refinery natural gas demand without a major overhaul of SCG infrastructure. Installing a tap and line extension to meet the capacity of the refinery was deemed an invalid option. The Lakewood Blvd route that is part of the proposed Project was considered a more favorable option for a variety of reasons. Lakewood Blvd is a six-lane street, and an open running line was identified by the preliminary utility research. The wider roadway allows for less traffic impact and more production rate during construction. The proposed pipeline would not be subject to in-line inspection due to the lower operating pressure on Line 1014 and the route does not have any impact on schools.
CBE-32	Cellulose biomass, composted yard clippings, sawdust, cornstalks can serve as alternate feedstocks using appropriate technologies to extract or pyrolize the material from the biomass; however, processes such as this are not commercially available at the scale of this Project. Additionally, they are not well defined in their cost, economics, or safety of operation at this time. There are considerable unknowns with respect to newer unproven technology so that a direct comparison of potential hazards to the current process that has been in operation at the facility for six years cannot be reasonably made. Use of unproven technologies could result in considerable discovery of issues after the fact. As technologies are developed and mature, they may be able to be utilized in a safe manner, but they are not at the state of commercialization as the proposed Project and are considerably more. Others are developing technologies that allow cellulosic biomass to potentially be treated in a manner to make suitable feedstock for the refinery's process. Should these developments be successful, the current refinery technology may be able to utilize materials derived from these materials. Development and use of alternate feeds as they become commercially viable will continue to be a part of the refinery's development process.
CBE-33	The decommissioning of the refinery would be handled under separate permit processing and CEQA review at the time of the decommissioning. The No Project Alternative utilizes what would reasonably be expected to occur in the foreseeable future, which is that the refinery would continue with the smaller renewable fuels project or process crude oil again under the permits which can still be used). A decommissioning alternative would be speculative and is incompatible with the Project's fundamental purpose, which is focused on providing renewable fuels. It is well established that an EIR need not present alternatives that are incompatible with the fundamental purpose of a project, and the lead agency can structure the alternatives analysis for an EIR based on a reasonable definition of the project's underlying purpose and need not study alternatives that cannot achieve that fundamental goal. In re Bay-Delta Programmatic Envt'l Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1166 (agencies may eliminate from consideration alternatives that would not "feasibly attain most of the basic objectives of the project"); San Diego Citizenry Group v. County of San Diego (2013) 219 Cal. App.4th 1, 24 (where the fundamental purpose of the proposed project was to encourage boutique wineries by requiring only ministerial permits for such wineries, the EIR was not required to consider imposing discretionary permitting requirements as a potential mitigation measure); Bay Area Citizens v Association of Bay Area Gov'ts (2016) 248 Cal. App. 4th 966, 1018 (the EIR for a regional GHG emissions reduction plan for reducing greenhouse gas (GHG) emissions did not have to include an alternative proposed by the petitioners, finding that alternative inconsistent with the basic purposes of the plan); Jones v Regents of Univ. of Cal. (2010) 183 Cal. App.4th 818 (EIR for the development plan for a special research campus was not required to consider an off-

Comment Number	Response
	site alternative location which because it would not achieve the project objective of creating a more campus-like setting at the existing site). Similarly, an EIR does not have to consider alternatives that would change the basic nature of the project. Al Larson Boat Shop, Inc. v Board of Harbor Comm'rs (1993) 18 Cal. App.4th 729, 745 (it was appropriate for an EIR to consider alternatives for port expansion could properly take into account the port's interests and accommodating more commercial shipping). A fundamental goal of the Project is to provide renewable fuels which reduce air and truck emissions and meet the requirements of CARB's LCFS program, thereby reducing dependence on fossil fuels. Renewable fuel plays an important role in California's goals to achieve carbon neutrality by 2045 because it contributes to the reduction of GHGs within industries that are difficult to decarbonize, such as heavy industry and aviation. (See, e.g., Driving California's Transportation Emissions to Zero, which is informing CARB's 2022 Scoping Plan Update, which states that "Electricity and hydrogen are the key fuels for decarbonizing on-road vehicles in the [primary low carbon] scenario, significant growth in low carbon liquid fuels compatible with internal combustion engines is still essential to meet the residual demand in these modes in addition to the demand for hard-to-electrify modes such as aviation and marine applications." Id. at p. 12. The report goes on to state that renewable diesel "will likely continue to be the most important compliance fuels for the next several years." Id. at p. 97. As explained in the Draft SEIR, the goals of the LCFS include reducing the carbon intensity of transportation fuels. Decommissioning the refinery would not achieve the fundamental goal of the Project to develop renewable fuels, rather, it would entirely change the basic nature of the Project. Thus, a decommissioning alternative is not an appropriate alternative to consider. Separately, the decommissioning of the refinery is entirely speculative, given the refinery's long history of operations, along with the fact that it still maintains its permits to operate petroleum refining equipment pursuant to prior CEQA review and subsequent South Coast AQMD permitting. "An EIR need not examine 'alternatives that are so speculative, contrary to law, or economically catastrophic as to exceed the realm of feasibility.'" Bay Area Citizens v. Association of Bay Area Governments (2016) 248 Cal.App.4th 966, 1018, citing Save San Francisco Bay Assn. v. San Francisco Bay Conservation etc. Com. (1992) 10 Cal.App.4th 908, 922. The MND and CUP for the Original Renewable Fuels Project in 2013 contemplated crude oil production alongside the initial conversion of some units for renewable fuels processing. That petroleum refining declined due to "changes in market demand and other factors" (see 2013 CUP) does not erase either the long-standing history of refining or, more importantly, the fact that the Refinery is currently entitled to continue processing petroleum. The air permits for the petroleum processing equipment have – and still are – maintained by the refinery. The processing of crude oil at the refinery could begin again without the approval of the Project, and petroleum and renewable refining could take place concurrently as contemplated by the 2013 CUP. Therefore, of the range of possibilities considered in the No Project Alternative, it is entirely reasonable and foreseeable that the refinery could resume refining. In contrast, the comment provides no evidence to suggest that the more likely scenario would be to continue operating only the Original Renewable Fuels Project if this Project were not approved, while the rest of the refinery is dismantled. There is no evidence that AltAir has ever contemplated such a scenario. Practically speaking, and considering the recent sales of the refinery to entities who continue to operate it, it would be potentially more reasonable to consider that disapproval of the Project could lead to the sale of the refinery to another operator. However, neither a sale of the refinery nor the decommissioning of a large part of the refinery are reasonably foreseeable given the lack of factual evidence regarding either scenario. Therefore, they are speculative, and the Draft SEIR should not consider an alternative whose effect cannot reasonably be ascertained or where the possibility of occurrence is remote or contingent on uncertain future events, because unrealistic alternatives do not contribute to a useful analysis. 14 Cal Code Regs §15126.6(f)(3); In re Bay-Delta Programmatic Envt'l Impact Report Coordinated Proceedings (2008) 43 Cal. 4th 1143, 1163; Foundation for San Francisco's Architectural Heritage v City & County of San Francisco (1980) 106 Cal. App.3d 893, 910; Bowman v City of Petaluma (1986) 185 CA3d 1065, 1084.

Comment Number	Response
CBE-34	The Vehicle Miles Traveled analysis is based on CEQA Guidelines 15064.3, which states that "vehicle miles traveled refers to the amount and distance of automobile travel attributable to a project". As per CEQA, the impacts are determined by the incremental increase, and as the refinery under the baseline had a substantial employed worker population, the worker population under the Project would be similar to the baseline. Therefore, very few impacts occur under "automobile" traffic impacts as part of the CEQA analysis. Note however that truck traffic is evaluated for intersection levels of service impacts in Section 4.8 and trucks miles traveled are included in the assessment of GHG impacts in Section 4.3. To calculate the VMT from these additional employees, the workers are assumed to travel 14.7 miles to/from the work site (as described in Appendix B, Page 1-9) which is the CAPCOA assumption for average vehicle trips for workers in Los Angeles County. As stated in CARB's 2017 Scoping Plan: "California's future climate strategy will require increased focus on integrated land use planning to support livable, transit-connected communities, and conservation of agricultural and other lands. Accommodating population and economic growth through travel- and energy-efficient land use provides GHG-efficient growth, reducing GHGs from both transportation and building energy use. GHGs can be further reduced at the project level through implementing energy-efficient construction and travel demand management approaches." Because of this mandate, the calculation of VMT focuses on the vehicle miles traveled by permanent employees to and from their places of employment Technical Guidance provided by the Office of Planning and Research indicates that Project-related trucks and construction activities are not part of this assessment. The DSEIR disclosed that construction workers will be required to park at the off-site location and be shuttled to the site. It is not an option. Also, automobile delay, as described solely by LOS or similar measure of traffic congestion, is no longer considered a significant impact under CEQA, except in locations specifically identified in the Guidelines. (Pub. Resources Code, § 21099(b)(2).) This provision took effect when the update to the CEQA Guidelines was certified in late 2018. (Guidelines, § 15064.3.) A recent appellate court decision (Citizens for Positive Growth and Preservation v. City of Sacramento (2019) 43 Cal.App.5th 609) confirmed that traffic congestion is no longer an environmental impact under CEQA.
CBE-35	Detailed modeling for both intersection levels of service and traffic cueing issues were conducted for the SEIR and are included in Appendix F. These were reviewed by the CEQA consultant as well as the City of Paramount and City of Bellflower engineers. Caltrans requirements for ramp impacts were also reviewed and are discussed in the TIA in Appendix F. The rail crossing for the MTA WSAB project was also reviewed and is discussed in the SEIR cumulative impact section for traffic, Section 4.8.5. As the MTA EIR examined the potential for impacts at the rail crossing, and incorporated mitigation measures to prevent rail crossing impacts due to traffic backing up, this potential impact is mitigated. The truck queuing analysis in Appendix F indicates that some truck backup could occur if sufficient gates are not open allowing trucks to enter and exit the refinery quickly enough. Therefore, the mitigation to require additional gates to be open, thereby reducing the timing for processing of trucks, would be an effective mitigation measure. Diesel trucks have idling prevention requirements codified in Airborne Toxic Control Measure is set forth in title 13, CCR, Section 2485, and requires, among other things, that drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds, including buses and sleeper berth equipped trucks, not idle the vehicle's primary diesel engine longer than five minutes at any location. CEQA

Comment Number	Response
	requires that regulatory requirements are not considered CEQA mitigation measures and basically are assumed to be complied with as part of a CEQA analysis. The TIA states the controlling factor in the prevention of stacking of Project site truck queues onto Lakewood Boulevard or Somerset Boulevard is the processing time at the inbound gate. This is based on Traffic Modeling as outlined in Appendix F of the Draft EIR, which constitutes substantial evidence. Therefore, it is recommended that when peak inbound demand on the gate occurs, a second gate would be opened within the next hour to clear trucks waiting for inbound facility access in the staging area and prevent any queue stacking onto public roadways. Mitigation Measure T-3a outlines the measures that are required and would be enforced to minimize queuing. As discussed under CBE 34, the EIR cannot consider traffic delay as an environmental impact Transportation hazards are specific to Project design features, not the level of vehicles forecasted to be generated by a project
CBE-36	The review and comment period for the CEQA period was extended by a period of 15 days to allow for sufficient review of materials. The SEIR and all Appendices were posted on the California Clearinghouse CEQAnet website, and, per their website, the website purpose is to "make available information about notices of exemption, notices of preparation, notices of determination, and notices of completion to the public through CEQAnet". And "its role is to make CEQA documents publicly available". The Appendices to the EIR are available through the City as well and unfortunately were not make available directly on the City website, but contact information for the City and the SEIR preparer were made available for questions.
Dan & Joanne Hare	
DJH-1	As part of the DSEIR, a detailed traffic analysis was conducted and is located in Appendix F. This analysis including reviewing traffic accidents in the vicinity over the last three years. This information is presented in Section 4.8 and in Appendix F. No unusual traffic accident frequency was observed. The lack of a traffic signal turning left onto Lakewood Blvd. from Somerset Blvd. was included in the traffic congestion modeling described in Appendix F. No changes in levels of service are predicted as part of the Project; therefore, this is no nexus for the installation of left turn signals at these intersections as part of this Project. Note that the refinery traffic would not be using the left turn movements from Somerset Blvd. onto Lakewood Blvd. and any movements from the refinery that turn left from Andry Drive on to Somerset Blvd. with subsequent left turn onto Lakewood Blvd. would be prohibited. The environmentally superior alternative identified in the SEIR is the use of pipelines to the maximum extent feasible to reduce the potential impacts of trucks.
DJH-2	The construction activities at the refinery during the Project are projected to produce levels of NO_2 that would exceed the applicable thresholds. Therefore, mitigation measure AQ-2b requires that the refinery provide air filters, with carbon and HEPA, to residences and the school, located within the projected NO_2 exceedance areas.
Jaime Lopez	
JL-1	The CEQA process is designed to provide full disclosure of potential impacts, and notifications to area residences and businesses take place to ensure awareness and to solicit feedback and input. The process includes coming before the decision makers in the community, the planning commission and the City Council, where area residences will have an opportunity to provide input on the Project to the decision makers. A community benefits agreement is an option associated with the permitting process before the City Council. A CBA may not provide the level of specificity required of the CEQA process. The NOx reduction program is proposed to allow for some level of community benefit centered specifically around NOx reductions, but other benefits could be proposed as part of the permitting process.
Los Angeles County Sanitation Districts	
LACSD-1	The Final SEIR has been modified to reflect the comment and now states that the irrigation system serves the street across from the refinery, but not the refinery itself.

Comment Number	Response
LACSD-2	Water for dust suppression during construction would use the existing water supply systems. Once the reclaimed water pipeline is put in place, reclaimed water will be used for dust suppression to the extent available.
LACSD-3	The Final SEIR has been updated with the numbers provided, and also the previous conversion to acre feet was corrected.
LACSD-4	The paragraph discusses recycled water as indicated in the opening sentence. The second sentence of the last paragraph on page 4.10-14 has been revised in the Final SEIR to clarify that the Los Coyotes WRP produces 6,000 AFY of recycled water.
LACSD-5	The recycled water demand for the facility is expected to be continuous as the facility operates 24 hours per day. As shown in Table 2.3, on-site recycled water storage is proposed to occur in three existing storage tanks, include a 630,000-gallon receiving tank and two treatment tanks.
LACSD-6	The Operator is required to contact the district and use dig alert prior to construction activities to locate all existing utilities and pipelines in the area prior to any excavation and construction of the new line.
LACSD-7	The SEIR states that the Operator will be required to obtain a modification to the wastewater discharge permit. As such, this would provide an opportunity for the district to ensure that appropriate capacity is available and appropriately modified as suggested in the comments.
LACSD-8	See LACSD-7.
LACSD-9	See LACSD-7.
LACSD-10	Information on capacity for treatment of wastewater is acknowledged. The Operator will be required to modify their existing permit with the Sanitation district as stated in the Draft SEIR.
LACSD-11	Please see response to LACSD-10 above. The comment is noted that there may be a fee associated with the additional wastewater discharged to the LACSD system. The fee will be discussed with the LACSD as part of the modifications to the Industrial Wastewater Discharge Permit application process.
LACSD-12	Please see response to LACSD-10 above. The comment that the letter does not guarantee additional wastewater service is noted. Details of the wastewater requirements will be reviewed with the LACSD as part of the Industrial Wastewater Discharge Permit application.
Mike & Cindy Guillen Nelson	
M&C-1	As part of the DSEIR, a detailed traffic analysis was conducted and is located in Appendix F. This analysis including reviewing traffic accidents in the vicinity of the refinery over the last three years. This information is presented in Section 4.8 and in Appendix F. No unusual traffic accident frequency was observed. The lack of traffic signal turning left onto Lakewood Blvd. from Somerset Blvd. was included in the traffic congestion modeling described in Appendix F. No changes in levels of service are predicted as part of the Project and therefore there is no nexus for the installation of left turn signals at these intersections as part of this Project. Note that the refinery traffic would not be using the left turn movements from Somerset Blvd. onto Lakewood Blvd. and any movements exiting the refinery and turning left from Andry Drive on to Somerset Blvd. with subsequent left turn onto Lakewood Blvd. would be prohibited. In addition, as trucks have historically utilized a left turn out of Andry Drive on to Somerset Blvd., and this movement would now be prohibited, there may actually be fewer trucks utilizing the left turn movement off of Somerset Blvd. than the historical average. Note also that truck traffic would be prohibited from traveling west on Somerset Blvd., near the entry/exit to the Rancho Capistrano development mentioned in the comment letter. The environmentally superior alternative identified in the SEIR is the use of pipelines to the maximum extent feasible to reduce the potential impacts of trucks.
M&C-2	The construction activities at the refinery during the Project are projected to produce levels of NO_2 that would exceed the applicable thresholds. Therefore, mitigation measure AQ-2b requires that the refinery provide air

Comment Number	Response
	filters, with carbon and HEPA, to residences and the school, located within the projected NO_2 exceedance areas.
M&C-3	CEQA bases impacts on the incremental changes from a defined baseline operations. If the Project does not change the baseline operations or changes the baseline operations but in a manner that is below defined thresholds, then the impacts are considered to be less than significant. The baseline operations of the refinery include a relative lack of landscaping around the entrance to the refinery and the Project would produce few changes to the visual quality of the area. Therefore, the CEQA process does not have a nexus for requiring additional landscaping. However, as part of the permitting process, additional landscaping could be included. Please note that AltAir contracts a landscaping company who maintains constant landscaping around its perimeter. Unfortunately, the property on the corner to the east of the entrance does not belong to AltAir, nor does the property directly west of the entrance, so AltAir does not have control of those properties.
Paramount Unified School District	
PUSD-1	The mitigation measure T-3a in Section 4.8 indicates that "*Rail activity shall not coincide with the morning and evening commute times or when students are going to or leaving school along Downey Avenue, including limiting rail deliveries to 9 a.m. to 6 p.m. weekdays and 10 a.m. to 6 p.m. on Saturdays. No deliveries during the evening, night, and early morning periods are permitted unless prior notification to the City of Paramount is provided;*". These limits are similar to limits that have been implemented over the last few years as part of the 2013 MND. Conflicts historically have not been reported, and therefore these limits appear to have been effective. These include limiting the timeframes when trains can be delivered. The processes involved in individual train arrival and departure would be the same under the Project as under the historical operations and no changes are proposed for the individual operations; only that more operations would occur. Multiple trains would not arrive at the same time. However, with the potential additional increase in rail traffic to two trains per day, instead of one per day as a peak, the potential for conflicts increases. Therefore, increased monitoring is proposed, including additional coordination with the School District, including "*Implement a system for monitoring of train arrivals and the associated impacts on Downey Avenue to identify any conflict issues or exceedances of the 5-minute delay times. Monitoring shall be conducted at least quarterly for the first year of the Project and as per the Public Works Director thereafter. A report shall be made to the City of Paramount within 60 days of each monitoring activity. Rail deliveries that occur with 30 minutes of school start or release hours shall be accompanied by a monitor at the Downey intersection. The Applicant shall obtain the school schedule from Paramount High School and Wirtz School every fall prior to the start of school for rail scheduling purposes*." The refinery indicates that limiting the delivery times further could be complicated due to the amount of material that may need to be moved and may not be feasible. Therefore, requiring a monitor to be located at the crossing is considered effective mitigation to ensure children crossing the rail tracks can be done safely.
PUSD-2	Truck traffic would not utilize Downey Ave and would utilize only the Andry Drive entry/exit for the refinery. Truck traffic is prohibited from traveling west on Somerset Blvd. from Lakewood Blvd. These measures limit the potential impacts of trucks on school foot traffic. As discussed under response PUSD-1, any trains arriving within 30 minutes of school start/release times would be required to have a monitor located at Downey Ave.
PUSD-3	Rail traffic could increase from a peak of once per day to twice per day. It would also increase in the number of days per year. Historically, the measures required by the 2013 MND (see Section 4.8.1.2, which included 10:00 a.m. - 6:00 p.m. train limits and limits deliveries to not when students are going to or leaving school) have been effective as no reports on issues are known. However, additional measures including the placement of a monitor at the Downey location when trains are arriving/departing within 30 minutes of school start/end as well as coordination with the School District will help to ensure that issues do not arise. A monitoring report on the issue is required to be presented to the City quarterly. Video monitoring of the Downey/railroad crossing has also been added to the FSEIR to help to identify any issues if a concern arises.

Comment Number	Response
	These measures, in combination with the historical measure effectiveness, are considered to be sufficient to mitigate the potential significant impact.
PUSD-4	The City of Paramount Municipal Code has been utilized as the thresholds for noise for the Project. The Municipal Code defines acceptable noise levels for schools as described in code Section 9.12.060.D: "*it is unlawful for any person to create, maintain or cause to be created or maintained, any noise or sound upon any school, hospital or church while the same is in use, which exceeds the noise standards as specified in Section 9.12.040 (see Table above) for the assigned noise zone in which the school, hospital or church is located, or which noise level unreasonably interferes with the working of such installations*." The area around the schools could be defined as industrial, single or multi-family, depending on the side of the school examined. Noise levels along Downey Ave., which borders the industrial area of the refinery, are projected to be within the allowable industrial maximum noise limits specified in the Municipal Code. The SEIR also examines as a guideline the General Plan average 24-hr noise levels and utilizes the Maximum Acceptable CNEL Noise Level, which for schools is defined as 70 dBA CNEL. Modeling indicates that these levels would not be exceeded.
PUSD-5	Section 7.0 details the mitigation monitoring plan and describes the timeline for the submission of plans and analysis, including the updated noise assessment. Section 7.0 requires the submission and approval of the noise assessment prior to permit issuance. Note that a detailed noise assessment was supplied as part of the DSEIR process, with multiple review periods and revisions as part of a detailed review process by the CEQA consultant. The noise assessment required to be conducted as part of mitigation measure N-2a would be a further update to these previous submissions. The FSEIR has also been updated to include the School District on the submission and approval process for the noise assessments.
PUSD-6	The noise modeling was conducted to assess the potential noise impacts on a number of receptors (see Table 4.7.7 for baseline and 4.7.15 for the Project), including the schools (receptor HWES - Elementary school and PHS - High School). Noise levels for the CNEL average were assessed at each of the schools. The thresholds for CNEL average noise impacts are based on an allowable increase over the baseline operations of 3 dBA. Although the baseline and Project indicate that the CNEL values would be above the guidelines in the general plan for schools, the incremental increase would be below 3 dBA which is below the allowable noise increase threshold and therefore the impact would be less than significant. Noise levels for the maximum allowed levels as specified in the municipal code are assessed along Downey Ave. adjacent to the refinery fence line, which is adjacent to the schools. Maximum noise levels along Downey Ave. adjacent to the schools would be below the Municipal Code levels. Note that CEQA bases impacts on the incremental changes from a defined baseline operations. If the Project does not change the baseline operations or changes the baseline operations but in a manner that is below defined thresholds, then the impacts are considered to be less than significant. The baseline operations of the refinery produce noise levels in the community and the Project was determined to not produce substantial increases over that baseline level.
PUSD-7	The natural gas pipeline would be located along Lakewood Blvd., entering the refinery from the south near the corner of Somerset Blvd. and the railroad tracks (see Figure 2-2). At this point, the natural gas pipeline would be located more than 2,000 feet from the closest school fence line. Impact zones of the pipeline are described in Section 4, Table 4.4.9, and for the Project in Section 4.4.4.2, and could extend as much as 321 feet, depending on the gas pressure and the exact configuration and break location, using the computer model Canary© to estimate the impact distances. This distance of impacts would not affect the school properties and the risk assessments as defined by the California Department of Education would not be applicable. Note that the hazards associated with the refinery, including all equipment and operations under the Project, are estimated to slightly reduce the hazards to communities and the schools located outside of the refinery (see Section 4.4.)

Comment Number	Response
PUSD-8	The SEIR examines the hazards associated with the refinery and assesses the potential incremental increases in hazards that could affect areas outside of the refinery area. The only hazard scenario which could affect the schools is a release from the gas liquids tanks and a subsequent BLEVE (explosion-type) scenario. These tanks currently exist at the refinery and their operations would not change as a part of the Project. CEQA bases impacts on the incremental changes from the defined baseline operations. If the Project does not change the baseline operations or changes the baseline operations but in a manner that is below defined thresholds, then the impacts are considered to be less than significant. As the baseline operations of the refinery includes these tanks, then the impacts are less than significant. The CEQA document therefore does not have a nexus to require additional measures at the refinery in regard to the gas liquids tanks. Note that the refinery is inspected by the Fire Department annually, the design of their systems, including the gas liquids tanks, are required to comply with applicable codes and standards (including such items are fire deluge systems), and has extensive emergency response planning and drills to ensure safety.
PUSD-9	The installation of an air quality monitor at the school site has been added to the FSEIR under mitigation measure AQ-1a. A system similar to the Aeroqual AQS-1 construction monitoring system (https://www.aeroqual.com/products/aqs-mini-air-quality-stations/aqs-construction-air-quality-monitor), which allows for data logging and communications. This system has been evaluated as part of the South Coast AQMD Air Quality Sensor Performance Evaluation Center (AQ-SPEC) program (http://www.aqmd.gov/aq-spec).
PUSD-10	Mitigation measure AQ-2b has been modified in the FSEIR to include the requirement that the refinery provide air quality filters and maintenance for those areas of the school sites that may experience exceedances of the federal NO_2 standards, which is primarily the southern portion of the elementary school and the south-eastern portion of the High School. The School District has been added to the mitigation monitoring program to ensure that all aspects of the monitoring are included in plans and procedures.
PUSD-11	See response to comment PUSD-8. Additional measures have been added related to air quality, including filter supplies and air monitoring equipment. Measures related to hazards are already incorporated into refinery emergency response coordination with the Fire Department and equipment design measures. As the baseline operations are the same as the Project, there is no nexus for determining that hazard impacts under CEQA would be significant.
Southern California Association of Governments	
SCAG-1	The FSEIR has been updated to include a reference to 2020 Connect SoCal and consideration of its adopted goals and policies.
SCAG-2	The comment suggests including information on population, housing, and employment trends and forecasts based on the most recently adopted SCAG Connect SoCal Regional Growth Forecasts to recognize the City's planned growth. Unlike many other areas within SCAG's region, the City of Paramount's population and number of households is only projected to grow 2.5 percent in the next 25 years. It is unclear how this small level of growth over the next 25 years would have any repercussion on this environmental review and Project.
SCAG-2	The SEIR preparers have reviewed the Final Program Environmental Impact Report (PEIR) for potential mitigation measures that could be refined based on those found in the PEIR Addendum. The mitigation measures included in this SEIR are specifically designed to mitigate the impacts incurred by the Project and those mitigation measures are directly related to those impacts and roughly proportional to the level of impact they are mitigating as required by CEQA.

Appendix H
AltAir Renewable Fuels Conversion Project
Final Subsequent Environmental Impact Report
Draft SEIR Responses to Comments
Support Letters

Comment Number	Response
Agustin Exiga	
AE-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Air Products and Chemicals, Inc.	
APCI-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
American Cancer Society	
ACS-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Breathe Southern California; Healthy Air Alliance	
BSC-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
California Advanced Biofuels Alliance	
CABA-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Campora Propane	
CP-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Chemco Products Company	
CPC-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Cherne Contracting Corporation	
CCC-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Dassel's Energy	
DE-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.

Appendix H
AltAir Renewable Fuels Conversion Project
Final Subsequent Environmental Impact Report
Draft SEIR Responses to Comments
Support Letters

Comment Number	Response
Domino's Pizza	
DOM-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Expo Propane	
EP-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Fred Becerra	
FB-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
FuturePorts	
FP-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Global Pump Service	
GPS-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Kiewit Corporation	
KC-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Long Beach Area Chamber of Commerce	
LBCC-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Los Angeles County Business Federation	
LACBF-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Mass Electric Construction Company	
MEC-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.

Appendix H
AltAir Renewable Fuels Conversion Project
Final Subsequent Environmental Impact Report
Draft SEIR Responses to Comments
Support Letters

Comment Number	Response
Mike McKown	
MM-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Move LA	
MLA-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Nancy Coop	
NC-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Rebecca Guillen Perez	
RGP-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
ROUSH CleanTech	
RCT-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Sacramento Clean Cities Coalition	
SCCC-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
South Gate Chamber of Commerce	
SGCC-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Southeast Los Angeles County Workforce Development Board	
WDB-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Ted Johnson Propane	
TJP-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.

Appendix H
AltAir Renewable Fuels Conversion Project
Final Subsequent Environmental Impact Report
Draft SEIR Responses to Comments
Support Letters

Comment Number	Response
Total-Western, Inc.	
TWI-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
United Airlines	
UA-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Van Unen Miersma Propane	
VUM-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Victor Lopez	
VL-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Western Propane Gas Association	
WPGA-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Western Propane Services, Inc.	
WPS-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.
Windmill Propane	
WP-1	The comment in favor of the Project is acknowledged. No specific comment is provided on the Draft SEIR and as such, no additional response is needed. Comments in favor or against the Project should be provided to decision makers when the Project goes before their consideration.

January 17, 2022

John Carver
Planning Director
16400 Colorado Ave.
Paramount, CA 90723

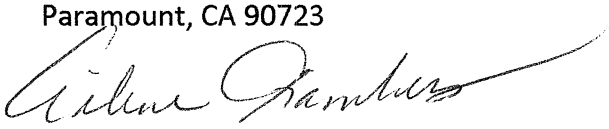
Re: World Energy Project
Environmental Impact Report

I wish to make the following comments and strongly oppose the World Energy Project.

1) Construction Process exceeds the AQMD's Threshold for Noise, Vibrations and Air Quality	AC-1
2) Operations Process exceeds the AQMD's Threshold for Noise, Vibrations and Air Quality	AC-2
3) Make Vehicle Traffic in the vicinity of the refinery a nightmare.	AC-3
4) Increased Rail traffic will further disrupt Downey Avenue	AC-4
5) The new electrical substation will greatly increase EMF's	AC-5
6) Digging for new buildings and relocation of existing facilities will collect water runoff and influence the already high water table	AC-6
7) In the Hazardous Materials section, why is there a red line under my building in Figure 4.4-4 and 4.4-5?	AC-7
8) Section 4.5.1.1 says the refinery has a containment pond for excess water runoff. Where is that pond? Also can you elaborate on locations where Sheet Flow takes place?	AC-8
9) Surrounding Land Uses 4.6.1.2 does not show Mustang Country or other small businesses that share a property line with the Refinery. Nor is it shown on the drawing 4.6.1	AC-9
10) SEIR does not sufficiently address the effects of the Project on adjacent buildings. Specifically Water pollution, Water levels, and vibrations affecting Structure and Foundations.	AC-10

Thank you for your Consideration.

Ailene Chambers
14833 Lakewood Blvd.
Paramount, CA 90723



The City of Bellflower
Families. Businesses. Futures.
16600 Civic Center Drive, Bellflower, CA 90706
Tel 562.804.1424 Fax 562.925.8660 www.bellflower.org

February 2, 2022

Mr. John Carver
Director of Planning
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

SUBJECT: Comments on Draft Subsequent Environmental Impact Report for the AltAir Renewable Fuels Conversion Project

Dear Mr. Carver:

The City of Bellflower has reviewed the City of Paramount's Draft Subsequent Environmental Impact Report (EIR) for the AltAir Renewable Fuels Conversion Project and has the following comments on the EIR. The City requests that the EIR be revised to address and respond to these comments.

1. **Aesthetics and Visual Resources**

Figure 4.1-2, Current and Post-Project Views of the Refinery, presents existing and post-project views of the project site from various directions. The City of Bellflower requests that an additional view from Lakewood Boulevard also be included in the EIR and Figure 4.1-2, since Lakewood Boulevard is within the City of Bellflower boundaries. This additional view will help the City to better understand and assess how the project improvements and facilities will be seen from Bellflower. CB-1

2. **Air Quality**

a. **Health Risk**: The EIR discusses cancer and health risks in the following excerpt:

"Table 4.2.6 shows the risk levels for cancer, acute and chronic health risks. Figure 4.2-3 shows the cancer risk contours. As per Appendix B, Part 2 Attachment D, the pre-Project cancer risks are driven by benzene (36.9 percent at the MEIR), DPM (29.7 percent at the MEIR), Polycyclic Aromatic Hydrocarbons (PAHs) (21.1 percent at the MEIR) and chromium (9.0 percent at the MEIR). Sources that contribute to the cancer risk are the on-site railcar mover (27.4 percent) and the heaters 303/304/305/306 at 13.6 percent. Acute and chronic risks are driven by benzene (97.2 percent and 97.1 percent, respectively). Source contributions are primarily fugitive emissions." CB-2

As discussed above, Figure 4.2-3, Baseline Refinery Operations Cancer Risks Contours, presents those areas that could be subjected to increased cancer and health risks. Unfortunately, there are no discussions or explanations on how to interpret the cancer risk contours that are presented in Figure 4.2-3.

Instead, the EIR references Appendix B, Part 2 Attachment D as the document to provide these discussions and explanations. Unfortunately, the Appendix B document was not attached to the EIR or found on the City's website. Therefore, the City cannot understand the statements being made in the EIR or determine if the project would actually result in any increased cancer or other health risks. The City of Bellflower requests that specific discussions, findings, and conclusions made in Appendix B regarding Bellflower be summarized in the EIR itself. CB-2 continued

b. **Odors**: The EIR discusses odors in the following excerpt:

"Odors could emanate from refinery operations due to the fugitive emissions of hydrocarbons containing H2S or other odor causing materials. Fugitive emissions of hydrocarbons are produced from crude oil storage tanks, other process vessels, and from components such as valves and flanges. Upset conditions could occur, such as spills or tank releases of vapors, which could cause odors at nearby receptors. See compliance history section below."

Review of the referenced compliance history section indicated that there were four odor nuisance violations over the past 20 years. This information only addresses past operations of the existing facility. The EIR, however, does not evaluate or quantify any long-term operational odors that could be generated due to the proposed project improvements and facilities. The EIR must evaluate long-term operational odors to be generated by the proposed project improvements and facilities as related to the City of Bellflower. CB-3

c. **Air Quality NOx Reduction Program**: The air emissions created by additional heavy-duty truck traffic traveling to and from the project location is an important issue for the Bellflower community. The EIR must state that the City of Bellflower will be included in the coordination and approval of the NOx Reduction Program that is referenced in the EIR as a mitigation measure. CB-4

3. **Hazardous Materials and Risk of Upset**

a. **Hazard Impact Zones**: Figure 4.4-5, Combined Hazard Impact Zones: Project Refinery, presents the onsite areas where vapor clouds, toxics, and thermal radiation could occur within the project site. Figure 4.4-5 shows that these hazards could extend beyond the boundaries of the project site to offsite areas within the City of Paramount. The figure, however, does not show those areas within the City of Bellflower that could also be impacted by these same hazards. The EIR must explain why potential offsite hazards would only extend into the Paramount City boundaries but not Bellflower areas, which are located directly across the project site along Lakewood Boulevard. CB-5

b. **Transportation Hazards**: The EIR indicates that increased rail, truck, and marine traffic could be increased with the proposed project. However, discussions in the EIR are only general in nature. The EIR must quantify how much additional rail, truck, and marine traffic would be increased by the project and how existing and future streets and routes could be affected, specifically within the City of Bellflower. CB-6

c. **Fuel and Gas Pipeline Hazards**: The EIR acknowledges that the project will transport hydrogen through modified pipelines, natural gas through new pipelines, and jet fuel through existing pipelines. Though the EIR concludes that hydrogen and jet fuel transport would not result in any significant impact, the EIR does conclude that natural gas transport could result in potentially significant impacts. The City of Bellflower may not agree with these findings and conclusions and therefore, requests that the EIR explain and assess where pipeline hazards could potentially occur, specifically within the City of Bellflower. CB-7

4. **Traffic and Streets**

a. **Degradation of Bellflower Streets**: The physical condition of Lakewood Boulevard and Somerset Boulevard is of high importance to the City of Bellflower. While the Traffic Impact Assessment (TIA) focuses on the impact to traveling conditions, it does not discuss the impending degradation of the existing intersection. The 540 daily round trips equates to 1,080 one-way trips, of which a minimum of 810 heavy-duty vehicles will travel through the intersection daily. Assuming an average vehicle load of 45,000 lbs per vehicle trip, the existing asphalt intersection will not withstand the proposed increase of truck traffic associated with the operations of project refinery. The EIR must assess and evaluate any degradation of Bellflower streets. Furthermore, the City of Bellflower is offering to discuss with the applicant possible remedies that can be implemented in order to protect the public roadways. CB-8

b. **Review of Traffic Management Plan**: The EIR indicates that a Construction and Operations Traffic Management Plan (TMP) will be prepared. Bellflower requests that the TMP be available for review and comment prior to the beginning of any construction. The City is concerned about the heavy-duty trucks that will be solely utilizing roadways within the Bellflower jurisdiction. CB-9

c. **Funding of Roadway Improvements**: The EIR indicates that the applicant will provide funding and design work to Paramount to allow for the striping of Lakewood Boulevard, southbound at Somerset Boulevard for a right-turn lane to reduce traffic congestion at the Lakewood Boulevard at Somerset Boulevard intersection. The EIR must consider and state that if this were to be approved, the funding and design work must be provided to the City of Bellflower since the roadway is owned and maintained by the City of Bellflower. CB-10

5. **Pipeline Design Alternatives**

a. **Relocated Natural Gas Pipeline Route Alternatives**: The EIR, in its discussion of relocated natural gas pipeline routes, does not evaluate impacts to those routes that are located in other cities, including Bellflower. The EIR must evaluate the over two miles of pipeline that is located in Bellflower, including impacts to Bellflower neighborhoods. Furthermore, alternative natural gas pipeline routes should be analyzed and considered in the EIR. CB-11

b. **Pipeline Transportation of Refinery Products Alternatives**: The air emissions created by additional heavy-duty trucks to and from the project location is an important issue for Bellflower. The applicant must provide details on the type of language that will be incorporated into contracts with 3rd party fleet companies transporting the product as it relates to heavy-duty truck emission standards. As an example, CARB provides a list of certified natural gas and propane-fueled engine facilities since 2016. Contract language should require that heavy-duty trucks transporting the applicant's product have engines listed on the CARB certified list. CB-12

6. **Short-Term Construction-Related Impacts**

a. **Additional Analysis of Construction-Related Impacts**: The project proposes improvements and facilities that will be installed within streets, pipelines, and alignments that are located within offsite areas, including areas within the City of Bellflower. The EIR, as currently written, only addresses construction-related impacts in a generalized manner for the various environmental issues and topics and does not provide any offsite-specific analyses. Accordingly, the EIR must quantify when possible and thoroughly evaluate construction impacts for air emissions, noise and vibrations, traffic disruptions, and utility disruptions and focus on how construction activities will disturb and impact those City of Bellflower land uses and activities that neighbor the project's construction sites and areas, streets, pipelines, and other alignments. CB-13

b. **Construction Management Plan**: The EIR needs to identify how and who will review and monitor the Construction Management Program (CMP). Bellflower requests that the CMP be available for review and comment prior to the beginning of any construction. CB-14

7. **Environmental Justice**

The EIR must discuss possible measures that the applicant can take to lessen impacts of the project on minority and low-income populations in Bellflower. These types of discussions and analysis are currently absent in the EIR. CB-15

8. **Comments on Remaining Impacts**

a. **Improvements along Lakewood Boulevard**: The TIA (Appendix F) indicates that restriping of the Lakewood Boulevard southbound lane would ensure that vehicles turning right onto Somerset Boulevard would not impede trucks continuing straight southbound on Lakewood Boulevard. The City believes that there is not enough available right-of-way within the City of Bellflower's boundary to create a 3rd 12-foot wide traffic lane on southbound Lakewood Boulevard with striping. The EIR must address and consider this issue and revise the mitigation measure as necessary. CB-16

b. **Truck Trips**: The EIR indicates that inbound trucks accessing the refinery from the south will turn left from Lakewood Boulevard to Somerset Boulevard and then take a right turn to Andry Drive. The EIR must consider and discuss the following: The length of the existing left-turn pocket for northbound Lakewood Boulevard at Somerset Boulevard is 180 feet. When utilized by both heavy-duty trucks and passenger vehicles during a light cycle, there is a high probability that vehicles in the left-turn lane will stack to a degree that will impact northbound Lakewood Boulevard through-traffic. This potential impact should be further evaluated in the EIR. CB-17

c. **Property Dedications**: The EIR indicates that there is the potential for trucks to cue along Lakewood Boulevard as trucks are exiting the project refinery, which could cause additional potentially significant congestion and safety issues in this area. In addition, trucks could continue along Lakewood Boulevard if there is a truck exiting the refinery onto Lakewood Boulevard from Andry Drive (if allowed); however, this would require the trucks making a right-turn onto Somerset Boulevard, where there is a median and the turning radius would require two lanes, also potentially causing additional congestion or safety issues. The City offers the following solutions to these issues, which should be assessed and considered in the EIR: These issues could be resolved if the applicant were to CB-18

dedicate a portion of their property to the City of Paramount between Andry Drive and the business to the north (Mustang Country) and then in conjunction with the City of Bellflower, construct a dedicated right-turn access lane to allow for southbound heavy-duty trucks to access the site. This could cause a slight modification to the location of the proposed warehouse intended for this area.

CB-18 continued

d. **Conflicts with 3rd Lakewood Boulevard Lane**: The EIR indicates that vehicles exiting the refinery onto Lakewood Boulevard and headed south would not generate issues crossing multiple lanes or create back and queuing-type issues and would therefore, not be expected to generate hazardous impacts. The City however, believes that this will create an issue if a 3rd lane for southbound Lakewood Boulevard were to be installed. The EIR must evaluate and consider this potential conflict.

CB-19

The City of Bellflower appreciates the opportunity to comment on Paramount's Draft Subsequent EIR for the AltAir Renewable Fuels Conversion Project and requests that the City revise the EIR accordingly. If you have any questions, please contact me at (562) 804-1424, ext. 2276 or email at ecorpuz@bellflower.org.

Sincerely,

Elizabeth Corpuz
Director of Planning and Building Services

16400 Colorado Avenue, Paramount, CA 90723
(562) 220-2036

Speaker Reno Redola	Residential community and can cause water perfusion. Remember, fertilizers contain nitrogen and phosphorus that can be washed away from soil to nearby lakes, rivers, etc. We find the plans and crops that will be converted into biofuels in view of this. Widening use of lands, it threatens our planet's rainforests to be destroyed, our remaining fuel on the planet, which is vital to fight global warming, which is [inaudible] as our salt, our polar ice caps from the arctic, down to the antarctic, to the Malaya's, the Alps, Greenlands, and Africa are melting so fast, just like what scientists are looking for now. The glaciers located in that region, antarctica is the size of Ruwanda and the widest on the planet. The [inaudible] doomsday glacier. Scientists confirm that it could shatter in the next 3-5 years. It holds enough water to raise the saline levels by over 2 feet. Why it's happening, due to the widening of our stratosphere as our source of existing carbon dioxide is being deleted from our parks, factories and, etc. Our rainforests that absorb carbon dioxide, supplying humanity for oxygen, carbohydrates for water are being destroyed across the planet.	RR-1
Speaker Gerald Cerda	Good evening, folks. My name is Gerald. I am also a concerned citizen. One of the questions that I have is when did world energy take over AltAir. I'm not sure when they took over the operations. We recently had a leak on Summerset, and I'm sure the full tier from World Energy are aware they can provide some more information. There was a hydrogen test leak on Summerset, I believe it was on December 8th, and it wasn't found until the 16th, from the information that I got. It looks like stuff was oozing out of the ground, and it was surprising because once I got information, I called the City, Public Works, and asked why is the road closed, one lane on each side, and they didn't have any information. They would send out an inspector to see what's going on. I never got a call back to see what's going on regarding the City, Public Works. So, lack of information. If this World Energy is operating AltAir, when did they start and did they notify the city. I'm getting information that maybe they're not responsible or maybe it's not part of their policy to notify the local city officials, but as residents and employees, probably business owners that are here, it would be very valuable to have a transparent operation. Everything on top of the table so that decisions could be made clear before any other improvements or changes are made to this facility. So, this hydrogen test leak, my information was on the 8th and it was reported on the 16th. They sent out a clean-up crew which took days, and certain agencies were notified, like South Coast Air Quality Management, and again, they have a rule of file too that if 6 people don't call, they don't do nothing. So, it's very	GC-1

important that some of these policies are changed, especially if World Energy may have flammable material/product, we're looking at a pipeline regarding natural gas, which – I'm not a genius, but – that would be flammable. So, we want to make sure that the risks would be kept low before any improvements are made and that the city is considered, the residents are considered, the citizens are considered, then the safety planning process. So, South Coast Air Quality Management was called, and they did some phone calls, and they were able to call back and get information. Also he has - the fire department was notified, and they were concerned stating, "Why is a resident calling us to notify us about this and not AltAir – not the operations facility?" So, that's a good question. Something to look at. Something to think about. What steps were bypassed. What steps were ignored. If it was done intentionally or there is lack of training, lack of policies and procedures, with this operation from World Energy. They do have what is called a Paramount LLC on the website that has their procedures when there is a leak, exposure – whether it's in house or out in the community, and I think that is very helpful or everybody. I think I give them a big plus on that to have it online so that anybody can see and educate themselves on what's going on. So, I did make some phone calls on the numbers that are there from the policies and procedures in case something does leak. I felt a little unease that the city officials mentioned that they were not aware. The Water Department said to call AltAir to get information. I mean, that's a fumble right there. If a resident is calling the City for information, the City should have information, not call the company that's part of the problem during that incident. Those are steps that could be improved. Something to look at. Keep everybody in the loop so that everybody is well informed. I know the city has a program in case there's a big natural disaster – earthquake, fire, flooding – and they train some of their citizens as part of the cert-program, but how useful is that program if the city officials are unaware of what's going on because the company does not have a policy and procedure implemented or their people are not trained to follow the policy and procedure to keep the community safe. I mean, that's something to look at. When I saw that, I said, "Okay, I'll attend the meeting and I'll ask questions." So, some of these companies do need to notify the proper agencies. I believe it's the office of emergency management system that was also aware. Hopefully, somebody is here from agencies, like South Coast Air Quality Management, [inaudible], probably the Hazmat. You know, it would be nice to have some of these folks in there so that they can be of some input. I'll leave it at that. Thank you very much.

GC-1 continued

Announcer Next we have Eileen Chambers

Ailene Chambers Good evening. I'm from Mustang Country, and I'd like to compliment MRS on the quality and the detail of your EIR report. I hardly noticed that my television didn't work for an entire week. So, my concerns are a little more self-serving. Mostly with regard to my business and how it affects my tenants, my customers, and so on and so forth. So a couple of the things in the plan, actually, I haven't even gotten around to operations. Operations don't concern me at this point. The 3 years of construction concerns me, and that being mainly dust, dirt, access to my facility, and some of the plans they have for the 540 trucks when the company is shifting from a pipeline-oriented business to one that uses trucks and railcars. So, some of the things outlined in the report are the number of trucks all coming

AC-1

out onto Lakewood Blvd off Landry Drive, and I trust everybody here knows where Landry Drive is, also making a dedicated right-hand turn lane from Lakewood Blvd onto Landry. That will back trucks all the way up to Mustang Country. They can difficult for us to get out and cars to see around, etc., it's just an awful lot of trucks. So, during the construction process, which is going to be 24 hours a day, my main concerns are the dirt, the dust, and the mud, and any other things, noise, vibrations, all these have to do with my retail customers and their ability to come and go. Also, we operate a big body shop there. We paint high-end cars. So, there, again, paint jobs don't do well when there's a lot of dirt and dust. Those are my main concerns and, so, see you at city council.

AC-1 continued

Announcer Next, we have [inaudible]

Speaker Sara Wiltfang

My name is [inaudible] Target. I'm with the Los Angeles County Business Federation, also known as BusFed. We are an alliance of over 200 business organizations who represent over 400,000 employers in Los Angeles County. We would like to thank you for the opportunity to comment on the draft EIR in support of the AltAir World Energy Renewal Fuels Conversion Project. As the world's first commercial production facility in sustainable aviation fuel, we believe this project is crucial in helping the state reach its decarbonation goals long-term. As stated in the draft EIR, the project's top four objectives are reducing dependency on fossil fuels, provide fuels that meet low carbon fuel standard, supply fuels that reduce truck and airplane emissions, [inaudible] refinery to 100% renewed fuels while creating over 200 high-quality jobs. While the facility is currently permitted to produce 39,000 barrels per day of crude oil, the converted facility will allow for a maximum production of 25,000 barrels per day of renewable fuels, drastically reducing emissions. What's more is since 2018, the Paramount facility has received significant upgrades and is a far cleaner plant under World Energy's ownership. World Energy has an excellent safety record, and this project will supply the region with millions of dollars in revenue annually. We believe the innovation and long-term benefits of this facility far outweigh any concerns. Thank you for your consideration of our cause.

SW-1

Announcer Barbara Creson

Creson

My name is Barbara Creson, and I am the executive director of the Paramount Chamber of Commerce. Thank you for the opportunity to comment in support of the AltAir World Energy Renewable Fuels Conversion project. From the Chamber of Commerce, our goal is to promote and encourage healthy, growing businesses in the community of Paramount. This affects our economy here and it provides a strong workforce for those who live here. But we also look out for the community at large and expect businesses to be an asset to the residents. This project is one that exemplifies that goal. Not only is this project reducing the allowed output and creating lower limits but changing the process and the product means a healthier Paramount all around. I am excited for AltAir World Energy Paramount to become a true leader and example to all of the United States in finding, producing renewable fuels and reduce the fossil fuel that is used. We commend the City for conducting a very thorough environmental impact review and to analyze the benefits and potential impacts of the project. We look forward to seeing the world's first commercial production facility of

BC-1

sustainable aviation fuel right here in Paramount. By transitioning this facility from petroleum and asphalt refinery to a renewable energy product site, World Energy will improve the health risk assessment by providing Paramount community with cleaner air and lower greenhouse gas emissions. This will also make Paramount a more attractive city to live and work, and I anticipate more businesses wanting to come to Paramount because we set a standard here for the workplace. It is important to note that if this conversion project does not go forward, then this facility's owner will continue to have the ability to restart the asphalt production at a rate of 39,500 barrels per day under its current permits. A renewable fuels production facility lowers any toxicity compared to a petroleum operation. This is better for Paramount residents, Paramount workforce and those communities around Paramount. I'm to be connected to Paramount and also to have World Energy Paramount as a member of our chamber.

BC-1 continued

Announcer Nick Garcia

Garcia

Good evening, ladies and gentlemen. I'm here in support of Paramount petroleum World Energy. I am a resident of the area. I am also a business agent for [inaudible] who are in support of this. My kid actually went to school 3 blocks away from World Energy over at Baxter Elementary, so I actually have roots here, and I would like to see, and I am seeing, that World Energy is actually doing everything they can to mitigate everything – any problems that they are coming up with – we have a small crew there abiding and working there with other trades in there, and, to be honest, I believe it is going in a better way, because now we have skilled and trained workforce that are in there compared to people who weren't skilled, who weren't trained through an apprenticeship program to see/catch these problems and mitigate these problems before they become a big problem. So, I am in support of this, and I hope everyone else will continue to support this project.

NG-1

Announcer Wynn Brecki

Brecki

Good evening, my name is Wynn Brecki, I'm the assistant city manager as well as the public worker here for the City of Bellflower. I'm here this evening to just discuss some issues with the draft EIR here. The city will be submitting a detailed list of concerns related to the EIR, but just briefly, the proposed operations, once underway, pushing over – I think the number in the traffic impact report is 1,080 semi-trucks through the intersection of Lakewood and Summerset on a daily basis during the 24-hour operation is extreme and deserves mitigation measures that are greater than what are listed in the EIR, which is to add a couple hundred feet of line striping. So, we will have some detailed comments on that, but then there are also the impacts associated where the air polluting from the 1080 trucks that will be driving up Lakewood Blvd and down Lakewood Blvd on a daily basis as part of the operations that do not have acceptable mitigation measures at this point in time in the EIR. So, as it stands right now with the draft, is opposing the project as it's written currently and anticipates having further discussions with the City of Paramount as well as the applicant over [inaudible] mitigation measures to be intersection at Lakewood and Summerset as well as impacts for air quality and sound issues that the Bellflower residents will be facing as part of this project.

WB-1

Announcer	Tommy [inaudible] Faavae	
[inaudible]	Good evening everyone, my name is Tommy [inaudible]. I represent IBEW [inaudible]. Our jurisdiction is LA County, and we have a lot of members that live here in Paramount. I would like to start off with saying that the City and the consultant that have put together this draft EIR, you guys have done a great job. Very transparent. We look forward to seeing this draft EIR move forward to the next steps. We look forward to building a great renewable project here in Paramount because we look forward to seeing our members work on these types of big projects. Thank you.	TF-1
Announcer	Chris Hannon	
Hannon	Good evening everybody. My name is Chris Hannon, Los Angeles, Orange County Building Construction [inaudible] Counsel representing 40 affiliate local unions and district counsels that have 140,000 of the very best trained, skilled men and women in the construction industry – period. First of all, I want to complement the City and the consultant for putting together a very thorough EIR. We look forward to supporting it in the future at future city meetings. This project is important – not only to the economy and to the households of the workforce that live in Paramount, but it's important to the regional goals to reduce emissions. This facility is going to be able to produce sustainable jet fuel, sustainable diesel that's going to help lower emissions in our airports, on our highways, and - you know, I have to also compliment World Energy for really stepping up to the plate coming to reach an agreement with us on a project labor agreement that is going to ensure every worker on the project has the very best training, the most thorough safety training, so, when there are impacts during the construction period, they're minimized. You're going to have safest workforce. You're going to have the most productive workforce. It's going to get done in the shortest amount of time and in the safest manner. Again, this is a very lengthy process, but on behalf of the building trades and all the members we represent, especially the members that live in Paramount and the surrounding communities that depend on these jobs to be able to support their families, we stick in support of the EIR and its eventual approval.	CH-1
Announcer	[inaudible]	
Speaker Jose Delemo	Good evening to everyone, public and as far as I can see, there are some employers, too. [inaudible] … killing people surrounded by the refinery. I want to know what happened with [inaudible] petroleum, what happened with AltAir, and those are questions that whenever they get a fine or anything, what they do is just switch names to a different company and they go if you have a problem. This could be a good opportunity for us, and I want to know whether our leaders like this also, the mayor, they should be here because this is an important decision that is going to affect all of us. I know it will get some jobs, which I don't think is a bigger number, but at the end, who is going to pay the price? As far as I know, like neighbors who live surrounded by a refinery, some of them, they have been already dead with cancer and different kind of respiratory problems, and nobody does anything. It sounds good to have biofuel, but the question is	JD-1

for where are we getting the materials? What are we using to process it? We have [inaudible] here in addition to the refinery, and, for me, the refinery, it used to be petroleum, that was worse than what I call the [inaudible]. I understand there are jobs and everything, but also across the street from the refinery, there is a school. [inaudible] They are [inaudible] from the refinery. I know that I feel so good. I consider myself a great [inaudible] – don't get me wrong. But at the end, the biggest problem that we are having in our society, it's our consumption and from posing 25,000 barrels per day – somebody already mentioned about the transportation – the trucks, and I already saw them at least 5 trucks parking on Sunset Blvd right next to the people or who lives next to them. As far as I know, there was a guy, a friend, he used to have a business just next to the refinery. He passed away last month. The doctor saw in his lung was cancer. Everything was strong. Why, because he was next to the refinery. Biofuel sounds good and everything. I'm not a scientist, but as far as I know, even some natural like trees or bats, they also can kill us. I hope this company will make an agreement with the school district, who is going to be paying for those kids who are going to be – like paying those things. Let's ask a single question. What is the benefit that we are going to have a community with this huge project? Work. Yes, I understand work. How many positions? And I know the city, they get some revenue, too. But at the end, who is going to pay the price? Us? Especially, the people who live next to them, and I'm surprised because I know some people who live around the refinery – I don't see them here. I hope you guys take the time to communicate with the people around the area. This is like I said, this is a good opportunity. We are in a pandemic. It's teaching us and [inaudible]. We have to make a change. There has to be a transition. We are being killed on the planet – all of us. But that will be a nice opportunity to a transition, and biofuel is not a good transition. Thank you.

JD-1 continued

Announcer Those are all the comment cards that we had. If there's anyone else that wants to make a comment, we can do that now.

Speaker I am a neighbor of World Energy. It is not fun. The smells that come from there are just unbelievable. Even several neighbors have called the air quality control, and they said they would look into it. And it's not just that. It's the noise. I live right by the 70-foot ficus trees. The black soot that is on those trees is unbelievable. It gets on everything that you own. It's on our houses. It's on our cars and you walk it into your house. So one day, I come home, I hear this "shhh-shhh" and I'm going, "What is that?" And I look over and World Energy put these great big tanks right by the fence and they start spraying deodorizer so we wouldn't smell these terrible smells. And just how healthy is this stuff that we're breathing. It can't be healthy. Another thing, I've noticed, there used to be a lot of squirrels, racoons, and possums and things right in back of us. There are very many owls there anymore. Why? Because of World Energy. Maybe these fuels are great, but at what expense? It's already a nightmare. The leaves from those trees, they clog up our rain gutters, the drains, everything. There on our roofs. Now we gotta put up with more noise and more pollution? I just don't see how this is possibly going to be any good, especially for the neighbors.

?-1

Announcer Is there anyone else that would like to comment?

Speaker

Yes, I was not going to make a comment, but I saw a staff member from the city that I live in, a neighboring city, Bellflower made a comment, so I'll make a comment. I agree with the lady who just spoke. It is really an incredible observation, like the animals have been dying, but not just the animals. We humans have been dying all up and down these factory streets pretty much right all the central and south Paramount. So, I think it's really shameful that we're making you guys that are in control are wanting to make this decision – you're trying to claim, "Oh, it's going to be good for jobs." The chamber of commerce president didn't mention the human cost, she just talked about making money, essentially. I think that's shameful. I think we need to care about our health – about human health. What you're doing here, if you go through with this, which you probably will, is you're condemning thousands of people to an earlier death than you would if… You know, why you're not putting these plants, why you're not making these expansions over in Beverly Hills? Answer that. So, this is really shameful of you. The community is not going to tolerate it because you're just creating more problems, and when the community notices, they're not going to be happy.

RH-1

Announcer Would you like to give your name for the record?

My name is Rona Hodges.

Announcer If there are no other comments, thank you for coming this evening. We'll be here if there are any questions about the project.

COALITION FOR CLEAN AIR

January 24, 2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Priority for Local Air Quality Improvement via Initiatives including AltAir/World Energy Renewable Fuels Conversion Project.

Dear Mr. Carver,

Coalition for Clean Air (CCA) supports, in concept, the implementation of the AltAir/World Energy Renewable Fuels Conversion project. The project will allow World Energy to significantly increase their output of renewable jet fuel, diesel, naphtha, and propane. This increased productivity will decrease reliance upon non-renewable petroleum fuels.

California will not be able to meet its climate or local air quality commitments without transforming the transportation sector. Transportation is the largest single contributor to California's greenhouse gas emissions, as well as approximately 80 percent of the state's smog-forming emissions. Further, transportation is the leading source of toxic air contaminants, such as highly carcinogenic diesel particulate matter.

World Energy is a leader in the development of low carbon and renewable fuels, including aviation fuel. Further, World Energy produces ingredients and components necessary for the creation of clean fuels. Their Paramount facility, previously a highly polluting asphalt refinery, has become a model for the renewable fuels industry and an important example of a just transition for workers shifting from the refining of petroleum products to a green economy.

In reviewing the Draft Subsequent Environmental Impact Report (DSEIR), however, we have found several opportunities to improve the environmental mitigation measures and benefits of the project. We have shared these recommendations with World Energy and appreciate their willingness to consider incorporating them in the project. These recommendations are:

- World Energy should commit to increasing the use of renewable feedstock to produce hydrogen, as well as the use of renewable fuels for process units, boilers, flares and incinerators. Further, World Energy should track the usage of renewable and non-renewable feedstock and process fuels and commit to reducing their reliance upon non-renewable feedstock over time.

CCA-1

- World Energy should commit to using battery electric or hydrogen fuel cell trucks to reduce emissions from increased truck trips. Many of the trips identified in the DSEIR, such as the movement of fuel from the refinery to the storage facility and back, are short and predictable. These trips can and should be serviced by zero-emission vehicles. At minimum, the commitment to use 2017 or newer trucks should be more detailed and enforceable.

    - Further, we note the commitment to use 2010 model year or later trucks should not qualify as a mitigation measurement. State regulations require all trucks to be 2010 or newer after January 1, 2023.

CCA-2

- CCA has concerns about the anticipated increase in air pollution from train trips to the region. We recognize World Energy has limited authority in this area, Further, we appreciate World Energy's willingness to work with Union Pacific to use locomotives meeting or exceeding Tier IV emission standards to serve the Paramount Refinery. As a matter of policy, Union Pacific should commit to using only their cleanest locomotives in the smoggiest air basin in the country.

CCA-3

- The oxides of nitrogen (NOx) reduction program mitigation measures for operational emissions are vague and potentially unenforceable. World Energy should commit to emission reductions from refinery operations rather than just saying they will create a fund to offset emissions. The mitigation measures should be specific, time-bound, quantifiable, measurable, and enforceable. This would also maximize the air quality benefits to the local Paramount community.

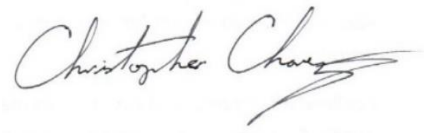
CCA-4

- Lastly, World Energy should consider developing a Community Benefit Agreement (CBA) through negotiations with Paramount community members. A CBA would ensure the local community will receive direct benefits from World Energy operations, as well as ensure the refinery is operating in Paramount's interests.

CCA-5

Thank you for considering our remarks as a part of the public comment on this project.

Sincerely,



Christopher Chavez
Deputy Policy Director

COMMUNITIES FOR A BETTER ENVIRONMENT
EAST YARD COMMUNITIES FOR ENVIRONMENTAL JUSTICE
CONCERNED PARAMOUNT RESIDENTS FIGHT POLLUTION
CENTER ON RACE, POVERTY, AND THE ENVIRONMENT
CENTER FOR ENVIRONMENTAL HEALTH
CENTER FOR BIOLOGICAL DIVERSITY
SOCIAL ECO EDUCATION-LA
EARTHJUSTICE

February 3, 2022

VIA: ELECTRONIC MAIL ONLY (JCarver@paramountcity.com)

Re: Comments on the Draft Subsequent Environmental Impact Report for the AltAir Renewable Fuels Conversion Project (State Clearinghouse No. 2020069013)

Dear Director Carver,

The undersigned environmental justice and health organizations submit these comments on the draft subsequent environmental impact report (SEIR) prepared for the AltAir Renewable Fuels Conversion Project (Project). The City of Paramount (City), as the lead agency for the Project, must correct the significant deficiencies in the SEIR by responding to comments and making critical revisions to the SEIR. Only after making these necessary updates can the City recirculate the SEIR for further public review and comment before finalizing and submitting it for consideration. In its current form, the SEIR fails to protect the environment and ultimately public health and safety from this inherently dangerous operation.

The fundamental goal of the California Environmental Quality Act (CEQA) is the protection of the environment, and as such, it should be "interpreted . . . to afford the fullest possible protection to the environment" when applied.[1] Moreover, CEQA aims to inform the public and decisionmakers about the potential significant environmental impacts of a proposed project.[2] However, the SEIR fails to afford the greatest possible protection to the environment and to serve as an informational document. Throughout its various sections, the SEIR misinforms the public and decisionmakers about the size and purpose of the Project, fails to provide sufficient information and analysis, makes legal and factual errors, and neglects to adequately mitigate significant environmental impacts, including:

[1] *Protecting Our Water & Env't Res. v. Cnty. of Stanislaus*, 472 P.3d 459, 468 (2020) (citations omitted); Cal. Pub. Res. Code §21000 et seq.
[2] Cal Code Regs. tit. 14, §15002(a)(1).

- The project description fails to consider key elements, including foreseeable impacts from the production and sale of excess gray hydrogen, types and hazards of low-grade feedstock, and differences between biofuel technologies;
- The cumulative impacts analysis relies on an unreasonably narrow geographic area to evaluate all environmental harms, while it avoided disclosing and analyzing other related projects and hazardous operations in the region;
- The air quality impacts analysis fails to disclose and analyze various emissions sources, including pipeline and downstream emissions, storage tank releases, and feedstocks, and prescribes inadequate, unenforceable mitigation;
- The significance of the environmental impacts caused by the Project are misleadingly evaluated based on conditions from 2011 despite the refinery shutting down crude oil refining permanently as of September 2017;
- The hazardous materials analysis fails to consider several public safety risks, including the potential for increased flaring hazards from routine operations and toxic dust migration during construction operations;
- The climate impacts analysis obfuscates the Project's climate harms, including the increased greenhouse gas (GHG) emissions from the production of feedstocks, and prescribes inadequate mitigation;
- The alternatives analysis ensures the Project would be approved as proposed by relying on overly narrow objectives, and fails to consider feasible alternatives, such as reduced throughput or green hydrogen options; and
- The transportation impacts analysis fails to disclose and analyze the Project's significant traffic hazards and congestion from thousands of construction workers and hundreds of daily trucks and prescribes inadequate mitigation.

Given the Project's significant environmental impacts, safety hazards, and the cumulative pollution burden already experienced by residents, thorough environmental review is critical here. The Project aims to increase throughput of tallow and vegetable feedstock to 25,000 barrels per day, construct gray hydrogen generation and recovery units, and install a natural gas pipeline through residential neighborhoods, among other onsite changes. These modifications would create increased flaring, fire, and explosion risks and would have significant environmental impacts on air quality, climate change, and transportation, among other environmental harms. Importantly, the Project—which would be adjacent to Paramount

High School, the Harry Wirtz Elementary School, and residential neighborhoods—would affect sensitive receptors and quality of life for thousands of families in the area.

Adequate environmental review is critical, particularly given that the Project presents serious health and safety risks to surrounding communities, along with significant environmental impacts for both local residents and the region at large. The SEIR cannot gloss over the significant, long-term pollution increases and climate impacts from the Project. The Project would exacerbate air pollution in an area that continues to suffer from some of the worst air pollution in the nation and would continue to lock-in our reliance on fossil fuels at a time when large GHG reductions and a transition to zero-emissions transportation alternatives are necessary to avoid climate change disaster. The City must revise the SEIR to provide the public and decisionmakers with the necessary information and analysis to allow them to fully understand the consequences of approving the Project.

***

I. The Project Description Fails to Adequately Capture the Scope of the Project

Under CEQA, a project description must represent the "whole of an action" to be undertaken by the lead agency—"[a]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR."[3] Indeed, "an accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity."[4] Moreover, the project description and analysis must include "future action" that is "a reasonably foreseeable consequence of the initial project" and would "be significant in that it will likely change the scope or nature of the initial project or its environmental effects."[5] For an action to be "reasonably foreseeable," it is not necessary that the project proponent decide exactly how the proposed project will be used, but rather that it intends a future action that is described in the environmental document.[6] The project description section in the SEIR fails to meet these CEQA requirements in several ways.

CBE-1

a. The Project Would Produce Excess Gray Hydrogen for Off-Site Use

The Project proposes the construction of a "75 MMSCF [million standard cubic feet] Hydrogen Generation Unit . . . to assure the refinery has sufficient hydrogen available to produce renewable fuels."[7] The Project description, however, fails to adequately disclose and

[3] Cal Code Regs. tit. 14, §§15124, 15378; *Cnty. of Inyo v. City of L.A.*, 71 Cal. App. 3d 185, 193 (Ct. App. 1977).
[4] *San Joaquin Raptor/Wildlife Rescue Ctr. v. Cnty. of Stanislaus*, 27 Cal. App. 4th 713, 730 (1994).
[5] *Laurel Heights Improvement Ass'n. v. Regents of Univ. of Cal.*, 47 Cal. 3d 376, 396 (1988), as modified on denial of reh'g (Jan. 26, 1989).
[6] *Id. at* 396–97; *Env't Council of Sacramento v. Cnty. of Sacramento*, 45 Cal. App. 5th 1020, 1030 (2020).
[7] SEIR at 2-8.

analyze the foreseeable generation of excess hydrogen for sale or use for other non-Project specific purposes. This foreseeable future action is confirmed by various statements throughout the SEIR, but the SEIR failed to include this aspect of the Project in the description and to disclose and analyze the foreseeable environmental impacts from increasing the availability and use of gray hydrogen in the region.

The SEIR acknowledges that "[w]hile there are no specific plans at this time, once hydrogen demand for the Project has been established via actual operation (including any acceptable/normal optimization of process variables), there is the potential that additional hydrogen could be generated within the unit's capacity design for other beneficial purposes in the Los Angeles area."[8] In fact, the Project proponent "has indicated that the hydrogen plant would be sized larger than what may be needed to supply only the refinery," and this excess could be "sent to other end-users through the hydrogen pipeline to the Carson Air Products Hydrogen Plant, and from there on to refineries or transportation needs through the existing hydrogen pipeline network in the southern area of Los Angeles."[9] CBE-1

The SEIR, however, dismisses this aspect of the Project by noting "[t]o facilitate use of hydrogen off-site, an undefined, separate project would need to be completed that is not part of the Project and is speculative at this time."[10] Although the SEIR elects to ignore this aspect of the Project as "speculative," it is an entirely foreseeable consequence of the Project and one that should be thoroughly analyzed in the SEIR.[11] The necessary infrastructure to engage in this action would be created by the Project (e.g., gray hydrogen generation and recovery units) or already exist at the refinery (e.g., hydrogen pipeline to Carson Air Products Hydrogen Plant). Moreover, the SEIR does not reference any enforceable legal restriction on the transfer or sale of excess hydrogen produced by the Project to other industries in the Los Angeles area.

The City and public cannot rely on the refinery's unenforceable promise to conduct thorough environmental review on this aspect of the Project sometime in the future—CEQA requires that this analysis and related disclosures be provided now as part of this Project.

b. <u>The Project Would Involve Continued Reliance on Offsite Petroleum Refining</u> CBE-2

[8] *Id*.
[9] SEIR at 5-5.
[10] SEIR at 2-8.
[11] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, 40 Cal. 4th 412, 432 (2007), as modified (Apr. 18, 2007).

The SEIR describes the Project as simply a "renewable fuels" project that would use non-edible vegetable oils and beef tallow.[12] This misleading description fails to note the Project's continued need and demand for crude oil refining offsite and use of crude-oil-derived distillates and other petroleum products for blending.[13] While the Project itself plans to change its feedstock, the Project description fails to disclose that the refinery would not completely discontinue the use of various fossil fuels and omits the extent of crude oil products needed to generate biofuels.[14] Because of this omission, the SEIR fails to analyze the environmental impacts associated with the increased demand and offsite production of petroleum distillates and natural gas for use by the Project.

CBE-2

c. The Project Would Modify Unknown Storage Tanks and Change Storage Capacity

The SEIR notes the Project will use "two existing 55,000-barrel storage tanks at the Lakewood Tanks Farm."[15] Further, the SEIR states that the Project will involve several modifications to existing storage tanks and permits, including enlarging up to three storage tanks and removing multiple storage tanks from service.[16] But the SEIR fails to describe this aspect of the Project in more detail and does not provide a table or a map identifying the relevant tanks and their location for the public and decisionmakers to review. The SEIR also neglects to explain to what extent existing storage tanks will be enlarged and how the storage capacity will change at the refinery. Instead, the public and decisionmakers are left to speculate about these proposed changes and the potential environmental impacts.

CBE-3

d. The Project Would Require Underground Storage Tank Permitting

In its agency permitting and approval list, the SEIR notes that the Los Angeles County Fire Department's Health Hazmat Division and the Los Angeles County Sanitation Districts will provide permits "required for any [underground storage tank] that is installed" as part of the Project.[17] The SEIR, however, fails to detail this aspect of the Project in its project description section. The SEIR does not disclose and analyze the number of underground storage tanks that will need to be modified, installed, or removed at the refinery. Consequently, the public and decisionmakers are left to speculate as to the hazards and other environmental impacts this aspect of the Project would create and what mitigation measures would be necessary.

CBE-4

[12] SEIR at 2-1.
[13] *See, e.g.*, *Greenwashing Fact Sheet Series: Fact Sheet 4 – Biofuels, Stay Grounded*, at 4 (Oct. 2021), https://stay-grounded.org/wp-content/uploads/2021/08/SG_factsheet_8-21_Biofuels_print_Lay02.pdf (noting industry's view that biofuels are sustainable in part because blending these fuels with fossil fuels would reduce CO2 emissions).
[14] *See* SEIR at 2-1.
[15] SEIR at ES-4.
[16] SEIR at 2-11.
[17] SEIR at 1-9.

e. The Project Would Process Lower Grade Feedstock, Not Only Technical Grade

At first, the SEIR notes the Project would merely involve processing "tallow and vegetable oils," but the details buried in the Project objectives contradict this assertion. An additional purpose of the Project is to process "*lower grade* fats, greases and oils" in addition to "technical grade tallows and vegetable oils."[18] The distinctions and potential environmental issues related to these different feedstocks are not addressed in the SEIR. For instance, the public is not provided with details to understand what types of materials would be considered lower grade fats, greases, and oils; the possible air pollution or other environmental impacts associated with using this lower grade feedstock; and the hazards associated with using lower grade feedstock that will likely require more processing to remove contaminants.

The SEIR's reference to "lower grade fats, greases and oils" is overbroad and could lead to categorial errors. This broad category of feedstock includes used cooking oil (e.g., "yellow" and "brown" grease) and industrial or undischarged sewage treatment plant "oil and grease" that is not yet commercially supplied at scale, among other feedstocks. The inclusion of the words "and oils" suggests the Project also intends to process crude vegetable oils, such as soybean and corn oil. This potential shift from tallow to soy and other oil crop vegetables would require significantly more hydrogen to process than tallow, increasing GHG emissions to produce the necessary hydrogen and elevating the risks of runaway reaction hazards and flaring discussed in Section IV.a below.[19]

CBE-5

Moreover, these lower-grade feeds can present more severe environmental impacts than other feedstocks. For instance, yellow and brown greases (i.e., used cooking oils) can have significant odor impacts from fugitive emissions during pretreatment, truck transport, loading/unloading, and storage tanks.[20] These odors are foul and smell like animal rendering

[18] SEIR at 5-3.

[19] Vegetable oils (both grades), which are likely to dominate project feeds, and fish oils, which could be included in project feeds, have higher process hydrogen demand, which result in significant greenhouse gas emissions from project hydrogen production and increase the frequency and magnitude of process upsets that result in flare emissions and worsen refinery explosion and fire hazards, as described in two recent reports (*See* Greg Karras, *Changing Hydrocarbons Midstream: Fuel Chain Carbon Lock-In Potential of Crude-To-Biofuel Petroleum Refinery Repurposing* at 19–27 (Chapter 3) (prepared for NRDC, Aug. 2021); Greg Karras, *Unsustainable Aviation Fuel: An Assessment of Carbon Emission and Sink Impacts from Biorefining and Feedstock Choices for Producing Jet Fuel in Repurposed Crude Refineries* at 16–22 (Chapter 3) (prepared for NRDC, Aug. 2021)..

[20] This class of feeds, also called "fats, oils and greases" (FOG), could result in significant impacts. Handling and pretreatment of rendered fats and used oils (e.g., tallow, used cooking oils, "yellow" and "brown" greases) could result in significant odor impacts (*See* Rodeo Renewed Project DEIR, SCH# 2020120330 at 4.3-79 & 4.3-80 (Oct. 2021, Version 2), https://ceqanet.opr.ca.gov/2020120330/3, and Martinez Refinery Renewable Fuels Project DEIR, SCH# 2021020289 at 3.3-41 (Oct. 2021), https://ceqanet.opr.ca.gov/2021020289/2).

plants, which can cause nuisance conditions and disrupt quality of life, as several recent examples in the region confirm.[21]

Finally, there are significant process hazards related to the "lower grade" feeds, including potential plugging, mainly in pipes between ships or trucks and tanks or pretreatment or hydro-conversion units in the refinery. Removal of metals and other contaminants from low-grade feeds as well as from "crude" vegetable oils, such as soybean oil, in feed pretreatment[22] could result in water quality impacts upon their disposal in wastewater, land impacts upon disposal in pretreatment solids, or both. The viscosity and solidification of lower-grade fats and oils, and their higher free fatty acids content, could cause feed train process upsets due to corrosion, plugging, and gumming.[23] The SEIR must revise the Project description to include this foreseeable use of the refinery and disclose and analyze the relevant environmental impacts. CBE-5

f. The Project Would Require the Use of Undisclosed Biofuel Refining Technology

The Project aims to "supply fuels that reduce individual truck and airplane emissions" and "fuels that meet the requirements of CARB's Low Carbon Fuel Standard[s]."[24] However, the SEIR's project description section leaves the public and decisionmakers to speculate as to what technology or processes the Project would use to produce these new fuels—this information is key because these technologies differ depending on whether the refinery plans to produce jet fuel or renewable diesel.[25] Given that these processes require the use of various technologies, the SEIR's failure to provide any of this background information prevents the public and decisionmakers from fully understanding the Project's scope. CBE-6

Further, the lack of information about the type of technology that will be used prevents the consideration of alternatives, such as Fischer-Tropsch synthesis, that may have different levels of environmental impacts. In comparison to hydrotreating esters and fatty acids (HEFA)—the process that is likely to be used by the Project based on the available information in the SEIR—Fischer-Tropsch synthesis can avoid the use of purpose-grown biomass feedstock.[26] The

[21] *Community Investigations: Rendering Plants in Vernon*, South Coast Air Quality Management District, http://www.aqmd.gov/home/news-events/community-investigations/rendering-plants (last visited Feb. 3, 2022).
[22] *See* Rodeo Renewed Project DEIR, *supra* note 20, at 3-30; Martinez Refinery Renewable Fuels Project DEIR, *supra* note 20, at 2-19.
[23] *See generally* Erin Chan, Burns & McDonnell, *Converting a Petroleum Diesel Refinery for Renewable Diesel* (2020); Erin Chan, Burns & McDonnell, *Converting a Petroleum Diesel Refinery for Renewable Diesel*, Hydrocarbon Processing, Apr. 2021, https://www.hydrocarbonprocessing.com/magazine/2021/april-2021/special-focus-clean-fuels/converting-a-petroleum-diesel-refinery-for-renewable-diesel.
[24] SEIR at 2-9.
[25] U.S. Dep't of Energy, *Alternative Fuels Data Center: Renewable Hydrocarbon Biofuels*, https://afdc.energy.gov/fuels/emerging_hydrocarbon.html (last visited Jan. 25, 2021); Karras, *Unsustainable Aviation Fuel*, *supra* note 19, at 3–4.
[26] Karras, *Changing Hydrocarbons Midstream*, *supra* note 19, at 4.

SEIR failed to evaluate this technology and to provide an explanation for why HEFA would be chosen instead—indeed, the HEFA process allows refineries to repurpose their crude refining equipment and protect otherwise stranded assets.[27]

CBE-6

The SEIR must disclose this information so that the public and decisionmakers can understand how the Project will operate and why the SEIR focused on a particular technology.

g. The Project Would Require Imports from An Undisclosed Port Terminal

The Project would import feedstock through the Port of Los Angeles "at an existing liquid bulk terminal" and asserts that "no construction or modifications to equipment would occur."[28] The SEIR's project description section, however, fails to disclose the specific terminal that will be providing the necessary feedstock to the Project. As a result, the public and decisionmakers have no means of evaluating the terminal's existing uses and verifying the SEIR's assertions that no further construction or modifications at the port terminal would be necessary to allow for the Project's operation. The SEIR must be revised to provide this information.

CBE-7

h. The Project Would Operate for An Undisclosed Period of Time

In describing the Project, the SEIR fails to note the expected lifetime for the Project.[29] The public and decisionmakers do not know whether these impacts would last half a century or perhaps more. This omission prevents the public and decisionmakers from understanding the full scope of the commitment the City would be making if it allows the Project to proceed. Understanding the Project's estimated lifetime would inform how environmental impacts and hazards should be evaluated. As written, the SEIR leaves the public and decisionmakers guessing as to how long impacts would last and what risks might emerge as the refinery and related Project modifications continue to age.

CBE-8

Indeed, the refinery started operating in the 1930s, and as described under Section III.a below, did not operate from October 2011 through September 2017 when it closed permanently.[30] The Project would allow an otherwise permanently shuttered refinery to repurpose and expand its operations. As equipment ages at refineries, however, the risk of life-threatening incidents, such as explosions and fires, increases — undoubtedly this risk would be particularly severe at mothballed refineries.[31] In fact, between 2018–2019, the industry

[27] *Id.* at 10.
[28] SEIR at 3-4.
[29] *See* SEIR at 2-1.
[30] SEIR at 1-2.
[31] *See generally* Marsh JLT Specialty, *100 Largest Losses in the Hydrocarbon Industry 1974–2019* (26th ed. 2020), https://www.marsh.com/us/industries/energy-and-power/insights/100-largest-losses-in-the-hydrocarbon-industry.html.

witnessed the largest number of major incidents at petroleum refineries since 1988-1989, with 13 of the 20 largest losses occurring since 2000. [32] These incidents have resulted in insurance rate increases by as much as 100 percent for some refineries, which has resulted in some refineries electing to limit coverage to cover losses [33]

CBE-8

Consequently, the City and public would potentially be left with a legacy of toxic pollution and losses when—not if—a major incident occurs at this inherently dangerous operation. The SEIR must revise the project description and disclose and analyze these risks in order to inform decision makers and the public of the Project's significant environmental impacts, as CEQA mandates.

II. The Cumulative Impacts Analysis Under the SEIR Is Inadequate

Under CEQA, an environmental impact report (EIR) must consider a proposed project's cumulative impacts, which is defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."[34] Cumulative impacts are "created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts."[35] Where an EIR limits the scope of the area affected by identified cumulative impacts, the agency must provide a "reasonable explanation for the geographic limitation used," but the selected area "cannot be so narrowly defined that it necessarily eliminates a portion of the affected environmental setting."[36] Moreover, the agency must consider "reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects."[37]

a. The Analysis Is Unreasonably Geographically Narrow Without Justification

CBE-9

The SEIR confirms the Project would have significant cumulative air quality impacts during construction and operations, and place additional burdens on environmental justice communities near the refinery.[38] But for most impacts, the SEIR concludes there would be no significant cumulative impacts, including traffic and hazardous materials, among others.[39] The SEIR makes these determinations based solely on a general one-size-fits-all, unreasonably

[32] *Id.*
[33] Laura Sanicola, *U.S. Refiners, Chemical Makers Pare Insurance Coverage as Accidents Boost Costs*, Reuters, Jan. 29, 2020, https://www.reuters.com/article/us-usa-refineries-insurance/u-s-refiners-chemical-makers-pare-insurance-coverage-as-accidents-boost-costs-idUSKBN1ZT0FB.
[34] Cal Code Regs. tit. 14, § 15355.
[35] *Id.* § 15130(a)(1).
[36] *Id.* § 15130(b)(3); *Bakersfield Citizens for Loc. Control v. City of Bakersfield*, 124 Cal. App. 4th 1184, 1216 (2004).
[37] Cal Code Regs. tit. 14, § 15130(b)(5).
[38] SEIR at 4.2-52, 4.11-14.
[39] SEIR at 4.7-45, 4.8-26, 4.4-44.

narrow geographical area without considering whether a different scope would be appropriate for each environmental impact to assess the unique potential cumulative effects.

In considering how the Project would exacerbate existing environmental conditions in the area, the SEIR narrowed its cumulative impacts analysis to "within *two miles* of the Project, and [to] other projects that may have an influence on cumulative impacts as appropriate."[40] The SEIR does not explain or otherwise support with substantial evidence why a two-mile radius would be appropriate or reasonable to assess cumulative impacts for all environmental harms.

The SEIR takes this narrow approach despite conceding the Project would also have *broader* regional or in some cases, even global cumulative effects that may require consideration of a different geographic area. For instance, the SEIR notes that "[t]he region of analysis for cumulative effects on air quality is the South Coast Air Basin . . . ."[41] Similarly, the SEIR notes "[e]missions of GHG are a global issue and therefore all GHG emissions are cumulative and would contribute to global GHG emissions impacts."[42] CBE-9

Importantly, the cumulative impacts assessment also ignores statewide impacts (e.g., impacts on California's climate policies) and national or international effects (e.g., land use and climate impacts). For instance, each biorefinery competes in the same markets for limited quantities of feedstock.[43] Thus, approval of the Project will necessitate increases in domestic oil crop production or foreign imports, which will cause environmental and climate effects.

Because the Project in some instances would not only have cumulative impacts on communities and the environment within two-miles, the SEIR's cumulative impacts analysis must also consider whether a different lens or geographic area would be appropriate to fully disclose and analyze the effects of permitting another hazardous, toxic operation in the region.

b. <u>The Analysis Ignores Trends and Several Related Past, Present, and Future Projects</u>

In evaluating cumulative impacts, the SEIR uses the list of projects approach that considers "past, present, and probable future projects producing related or cumulative impacts."[44] Because the SEIR confined its analysis to a two-mile radius, there are other similar past, current, or likely future biofuel and related hazardous projects in the region that are not CBE-10

[40] SEIR at 3-2.
[41] SEIR at 4.2-51.
[42] SEIR at 4.3-19.
[43] *See, e.g.*, Stephanie Kelly, *U.S. Renewable Fuels Market Could Face Feedstock Deficit*, Reuters, Apr. 29, 2021, https://www.reuters.com/business/energy/us-renewable-fuels-market-could-face-feedstock-deficit-2021-04-09/.
[44] Cal Code Regs. tit. 14, § 15130(b)(1)(A).

identified or discussed in the SEIR. For instance, the Chevron El Segundo refinery that is 17 miles away is currently planning to co-process bio feedstocks.[45]

Indeed, there are several petroleum refinery conversions taking place to process non-crude oil feedstocks, including several large projects already occurring in Northern California, such as the Phillips 66 proposal to convert its refinery into an 80,000 barrel per day biorefinery.[46] Marathon Petroleum Corporation is also proposing to convert its closed refinery in Martinez into a 48,000 barrel per day biorefinery and Bakersfield Renewable Fuels is similarly converting a closed refinery into a 15,000 barrel per day biorefinery.[47] CBE-10

Moreover, across the United States, almost 20 biofuel projects have been proposed or are already under construction.[48] The U.S. Energy Information Administration also predicts a significant increase of renewable diesel production through 2024 on the West Coast to meet the California Low-Carbon Fuel Standard.[49] It is foreseeable that additional biofuel projects will be proposed in the region – as a result, it is critical that these biofuel trends be disclosed and analyzed in the SEIR.

III. The Air Quality Impacts Analysis Under the SEIR Is Inadequate

a. The 2011 Baseline Does Not Reflect Existing Conditions at the Refinery

The baseline used in an environmental impact report must generally reflect "physical environmental conditions as they exist at the time the notice of preparation is published."[50] Utilizing existing conditions for the baseline is important to allow the public and decisionmakers to understand to what extent the proposed project would impact or worsen the environment. An agency can deviate from existing conditions under limited circumstances to "provide the CBE-11

[45] Janet McGurty, *Refinery News: Chevron to Co-Process Biofeed at El Segundo's FCC*, S&P Global Platts, Mar. 3, 2020, https://www.spglobal.com/platts/en/market-insights/latest-news/oil/030320-refinery-news-chevron-to-co-process-biofeed-at-el-segundos-fcc; Chevron U.S.A., *Chevron, Delta, Google Announce Intent to Measure SAF Emissions*, Biomass Magazine, Sept. 9, 2021, http://biomassmagazine.com/articles/18305/chevron-delta-google-announce-intent-to-measure-saf-emissions.

[46] Bloomberg, *Phillips 66 is Turning A California Oil Refinery Into a Biofuel Plant*, Los Angeles Times, Aug. 12, 2020, https://www.latimes.com/business/story/2020-08-12/phillips-66-oil-refinery-biofuel-plant; Rodeo Renewed Project DEIR, *supra* note 20, at xxii.

[47] *Marathon Petroleum to Convert Martinez Refinery to Renewable Fuels Facility*, Biofuels Central, March 9, 2021, https://biofuelscentral.com/marathon-petroleum-convert-martinez-refinery-renewable-fuels-facility/; *GCEH's Retooled Biorefinery is on Schedule to be Operational in Q1 2022*, Global Clean Energy Holdings, https://www.gceholdings.com/production (last visited Feb. 2, 2022).

[48] Comments by Asian Pacific Environmental Network, et al. regarding Marathon Martinez Refinery Renewable Fuels Project DEIR, at 77 tbl.10 (Dec. 17, 2021).

[49] U.S. Energy Information Administration, *U.S. Renewable Diesel Capacity Could Increase Due to Announced and Developing Projects* (July 29, 2021), https://www.eia.gov/todayinenergy/detail.php?id=48916.

[50] Cal Code Regs. tit. 14, § 15125(a).

most accurate picture practically possible of the project's impacts," such as historic conditions when conditions *change* or *fluctuate* over time.[51]

The City published the notice of preparation on June 4, 2020.[52] The SEIR, however, selected 2011 "as the baseline operating year due to that being the most recent year when the refinery was operating as historically refining crude oil."[53] The SEIR lacks any substantial evidence supporting the use of this artificially high historical baseline or explanation regarding how this baseline provides a more accurate or realistic measurement of the Project's impacts.[54] Indeed, a historical baseline would not be appropriate here given that the refinery was modified and already partially processing non-crude oil feedstock since at least 2016.[55]

These modified operations at the refinery likely impacted the baseline emissions that should be considered to evaluate the Project's air and other impacts. Annual Emissions Reporting (AER) data submitted by the refinery to the South Coast Air Quality Management District (SCAQMD) in 2011 confirm the refinery released 68.188 tons of nitrogen oxides (NOx), 12.071 tons of sulfur oxides (SOx), and 73.832 tons of volatile organic compounds (VOCs).[56] In contrast, the AER data for 2020 shows the refinery released 20.259 tons of NOx, 3.166 tons of SOX, and 16.24 tons of VOCs.[57] In other words, compared to 2020, the 2011 emissions of NOx were over three times higher, emissions of SOx were almost four times higher, and emissions of VOCs were about 4.5 times higher. Undoubtedly, by selecting a 2011 baseline, the SEIR aims to minimize *on paper* the *real-world* impacts the Project will have on existing conditions. CBE-11

Moreover, in support of this baseline selection, the SEIR presents annual historical volumes of crude oil processed at the refinery without a citation to any source.[58] The SEIR represents that the refinery has processed crude oil continuously through 2011 and 2012. These representations, however, are contradicted by official U.S. Energy Information Administration (EIA) data. The U.S. EIA reports operable, operating, idle or permanently shut

[51] *Id.* § 15125(a)(1); *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.*, 57 Cal. 4th 439, 452 (2013) (noting an agency may omit existing conditions when an "analysis based on existing conditions would be uninformative or because it would be misleading to decision makers and the public.").
[52] SEIR at ES-3.
[53] SEIR at 4.2-11.
[54] *Communities for a Better Env't v. S. Coast Air Quality Mgmt. Dist.*, 48 Cal. 4th 310, 328 (2010).
[55] *See* SEIR at ES-6.
[56] SCAQMD, FIND Database, Paramount Petroleum Corp. (Facility ID 800183), https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=800183 (to view AER data referenced, select 'Emissions' from the drop-down menu, then select AER Year 2011) (last visited Feb. 1, 2022).
[57] SCAQMD, FIND Database, AltAir Paramount, LLC (Facility ID 187165), https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=187165 (to view AER data referenced, select 'Emissions' from the drop-down menu, then select AER Year 2020) (last visited Feb. 1, 2022).
[58] SEIR at 1-5 fig.1-2.

down crude refining capacity of each U.S. petroleum refinery each year.[59] This data indicates that crude oil processing at the Paramount Refinery was permanently idled in October 2011 and was shut down permanently in September 2017.[60] *See* Table 1.

Table 1. Paramount Refinery Petroleum Processing Phaseout History

Atmospheric crude distillation capacity in barrels per calendar-day

Year	Corporation or owner listed	Status	Operable	Operating
2007 [a]	Paramount Petroleum Corporation	Operating	50,000	50,000
2008 [a]	Paramount Petroleum Corporation	Operating	53,000	53,000
2009 [a]	Paramount Petroleum Corporation	Idled	53,000	0
2010 [a]	Alon Israel Oil Company, LTD	Operating	53,000	53,000
2011 [a, b]	Alon Israel Oil Company, LTD	Idled	53,000	0
2012 [a, b]	Alon Israel Oil Company, LTD	Idled	84,500	0
2013 [b, b]	Alon Israel Oil Company, LTD	Idled	84,500	0
2014 [a, b]	Alon Israel Oil Company, LTD	Idled	84,500	0
2015 [a, b]	Alon Israel Oil Company, LTD	Idled	84,500	0
2016 [a, b]	Alon Israel Oil Company, LTD	Idled	84,500	0
2017 [a, b]	Alon Israel Oil Company, LTD	Idled then closed	84,500	0
2018 [b]	*Permanently shut down Sep 2017*	Closed	0	0
2019 [b]	*Permanently shut down Sep 2017*	Closed	0	0
2020 [b]	*Permanently shut down Sep 2017*	Closed	0	0
2021 [b]	*Permanently shut down Sep 2017*	Closed	0	0

Petroleum processing ceased permanently at the Paramount Refinery during 2011. Data from (a) U.S. Energy Information Administration (EIA) https://www.eia.gov/petroleum/refinerycapacity; and (b) EIA https://www.eia.gov/petroleum/refinerycapacity/table13.pdf

CBE-11

For these reasons, the selection of a baseline reflecting environmental conditions from over 10 years ago when the refinery was purportedly refining crude oil rather than using existing conditions and operations would not be an appropriate measure of the severity of the Project's significant environmental impacts. The shift at the refinery from crude oil refining in 2011 to at least partial biofuel production since 2016 is not a temporary change—it involved various, permanent modifications to existing refinery processes. Moreover, as official government data confirms, the former petroleum refinery was idled entirely from October 2011 to September 2017 when it closed permanently: thus, the SEIR's assertion that the Project impacts should be analyzed by comparing them with emissions from when the refinery was last processing crude oil in 2011 is at best a factual error. Describing the existing conditions as they were over a decade ago is illusory and misleading to the public and decisionmakers. The SEIR must be revised to address these baseline concerns.

[59] U.S. Energy Information Administration (EIA), *Refinery Capacity Data by Individual Refinery*, https://www.eia.gov/petroleum/refinerycapacity (reported as of January 1 annually); *see also* U.S. EIA, *Refineries Permanently Shutdown by PAD District Between January 1, 1991 and January 1, 2021*,https://www.eia.gov/petroleum/refinerycapacity/table13.pdf.

[60] *Id.*

b. The Operational Pipeline and Downstream Emissions Are Ignored

The SEIR calculates the Project's operational emissions from various sources, including heaters, boilers, incinerators, flares, storage tanks, loading/unloading racks, cooling towers, process vents, trucks, and rail, among other sources.[61] The SEIR, however, fails to account for pipeline operation and maintenance emissions, in addition to downstream emissions from the combustion of its biofuels. Consequently, in evaluating the Project's environmental impacts, the SEIR did not thoroughly consider and analyze all short and long-term "direct physical changes" and "reasonably foreseeable indirect" changes that may be caused by the Project.[62]

The SEIR confirms that pipeline emissions are a foreseeable consequence of the Project. The SEIR notes that natural gas pipelines "are required to accommodate instrumented internal inspection devices (commonly referred to as 'smart pigs')."[63] These instruments are meant to "detect where corrosion or other damage has affected the wall thickness or shape."[64] But the SEIR then fails to disclose and analyze the quantity and type of emissions—such as VOCs and methane—that would be released by the proposed natural gas pipeline during the use of these pipeline pigs and other maintenance pipeline activities.[65]

CBE-12

Additionally, the SEIR does not disclose and analyze emissions from the combustion of biofuels produced by the Project.[66] The Project would add to the current "50 million gallons per year of renewable fuels" produced at the refinery, which has a current throughput of 3,500 barrels per day.[67] The downstream impacts of the confirmed end use of these fuels should be quantified and analyzed for decisionmakers and the public to understand the extent of environmental harm that would result from the continued production of combustion fuels. The SEIR should then factor in adequate mitigation of these foreseeable impacts.

[61] SEIR at 4.2-27 tbl.4.2.10.
[62] Cal Code Regs. tit. 14, § 15064(d); Cal. Pub. Res. Code § 21065
[63] SEIR at 4.4-41.
[64] *Id*.
[65] U.S. EPA, Enforcement Alert: EPA Observes Air Emissions from Natural Gas Gathering Operations in Violation of the Clean Air Act, Publication No. EPA 325-F-19-001(Sept. 2019), https://www.epa.gov/sites/default/files/2019-09/documents/naturalgasgatheringoperationinviolationcaa-enforcementalert0919.pdf (noting that "EPA and state investigations have identified Clean Air Act (CAA) noncompliance caused by unauthorized and/or excess emissions from depressurizing pig launchers and receivers."); U.S. EPA, Presentation for NOGC: Air Emissions from Natural Gas Pipeline Pigging Operations (Dec. 12, 2019), http://vibe.cira.colostate.edu/OGEC/docs/meetings/2019-12-12/03%20Pigging%20Dec%202019.pdf; U.S. EPA, Methane to Markets Presentation: Efficient Pigging of Gathering Lines (Jan. 17, 2007), https://www.globalmethane.org/documents/events_oilgas_20070115_15jan07-efficient_pigging_of_gathering_lines.pdf (discussing methane losses from pipeline pigging); Daniel J. Zimmerle et al., *Gathering Pipeline Methane Emissions in Fayetteville Shale Pipelines and Scoping Guidelines for Future Pipeline Measurement Campaigns*, Elementa: Science of the Anthropocene (2017), https://doi.org/10.1525/elementa.258 (discussing contribution of pigging operations to methane releases from pipelines).
[66] *See* SEIR at 4.2-28 —4.2-34.
[67] SEIR at ES-6, ES-10.

c. The Storage Tanks Emissions Are Unclear and Underestimated

The SEIR describes modifications to storage tanks but fails to note that VOC emissions from these tanks will in part be from petroleum distillates, such as gasoline.[68] The SEIR then concludes without further analysis or information that "vegetable oils and tallow used as feedstock do not produce VOC emissions from tanks, or other equipment, such as components or unloading/loading racks at the refinery or the port."[69] The SEIR does not consider other air emissions from the storage of these feedstock materials – in fact, other than VOCs, the SEIR does not list any other pollutants from storage tanks. Nor does the SEIR explain whether the same finding applies to "lower grade fats, greases and oils" that the Project aims to process.[70]

VOC emissions from the storage and transfer of vegetable oil and animal fat feedstocks in the subject equipment could not be zero, as these feedstocks *do not have volatilities of zero*. Emissions of malodorous volatile components of lower-grade feedstocks proposed here have the potential to cause significant odor impacts before they are converted to biofuels.[71] After the technical and lower-grade feeds are converted to fuels, volatile components of the biofuel yield—such as naphtha, propane, and LPG— could account for 7.6 to 17.2 weight percent of the total feed input.[72] Since those light and gaseous hydrocarbons are virtually identical whether made from biomass or petroleum, VOCs could emit from these hydrocarbons from the converted feed in storage and associated piping and loading/unloading equipment components at similar rates to their petroleum fuel counterparts, on a gallon for gallon basis.

CBE-13

Further, the SEIR fails to consider the SCAQMD's Fluxsense study published in 2017, which determined that emissions from storage tanks are significantly higher than what petroleum refineries report in official emissions inventories.[73] The study found that average VOC emissions can be as much as 6.2 times higher and cancer-inducing benzene emissions 34 times higher at area refineries than what is officially reported.[74] Because the Project would continue to store and blend petroleum products, the SEIR must disclose and analyze the

[68] SEIR at 4.2-29.
[69] *Id*.
[70] SEIR at 5-3.
[71] *See* Rodeo Renewed Project DEIR, *supra* note 20, at 4.3-79; and Martinez Refinery Renewable Fuels Project DEIR, *supra* note 20, at 3.3-41.
[72] Pearlson et al., A Techno-Economic Review of Hydroprocessed Renewable Esters and Fatty Acids for Jet Fuel Production, 7 Biofuels, Bioproducts & Biorefining, 89, 91 tbl.1 (2013), https://doi.org/10.1002/bbb.1378. . *See also* Karras, *Changing Hydrocarbons Midstream, supra* note 19, at 7-10 (Chapter 1).
[73] Fluxsense/SCAQMD, Emission Measurements of VOCs, NO2, and SO2 from the Refineries in the South Coast Air Basin Using Solar Occultation Flux and Other Optical Remote Sensing Methods (Apr. 11, 2017) at 4–5, http://www.aqmd.gov/docs/default-source/fenceline_monitroing/project_1/fluxsense_scaqmd2015_project1_finalreport(040717).pdf.
[74] *Id.*

potential for higher VOC emissions from storage tanks than what is generally expected under the modeling used by the SEIR. CBE-13

d. The SEIR Fails to Disclose and Analyze Emissions from Various Feedstocks

As detailed under Section I.e above, the SEIR notes the Project would process technical grade "tallows and vegetable oils," but also aims to process "lower grade fats, greases and oils" at the refinery.[75] The SEIR, however, fails to detail whether emissions from lower grade fats, greases and oils would be more significant than technical grade tallow and vegetable oils. Indeed, it is reasonable to expect that contaminated, lower-grade feedstock would require more processing and pretreatment. This would in turn require more use of refinery equipment, such as pumps, compressors, and other process units, and thus would result in increased emissions than might be expected with higher quality feedstock.

Lower grade rendered animal fats (e.g., tallow) and greases (e.g., used cooking oil, and "brown grease") have known potential to result in significant odor impacts, as noted above.[76] Worse—and elided by the vague and incomplete feedstock description in the SEIR—processing the "other oils" in this lower grade category can be expected to result in significant emissions for three related feed-specific reasons: (1) vegetable oils that require pretreatment[77] could comprise the majority of feed blends processed; (2) processing vegetable oils requires more hydrogen than processing livestock fats, such as tallow; and (3) process hydrogen demand drives biorefinery GHG and flare emissions. CBE-14

First, vegetable oils would likely dominate feedstock blends because supply for the other feedstocks that the Project could process would be severely limited. The Project's hydro-conversion equipment is limited to lipidic (oily) plant oil, livestock fat, fish oil, and used oil combinations of these primary oil sources for its feedstock.[78] Recent technical reports have found sustainable supplies of these feeds for all uses, including food, animal feeds, and others besides biofuels, are too limited for any of those feed types, except plant oils, to comprise more

[75] SEIR at 2-9.
[76] *See* Rodeo Renewed Project DEIR at 4.3-79 & 4.3-80, *supra* note 20, and Martinez Refinery Renewable Fuels Project DEIR at 3.3-41, *supra* note 20.
[77] Soybean oil, distillers corn oil, canola oil, and other lower-supply vegetable oils from oil crops. The City could expect most of these feeds to be "lower grade" due to the cost-effectiveness of utilizing on site pretreatment, however, pretreated vegetable oils pose the same hydrogen-related process impacts described in this subsection.
[78] *See* Karras, *Changing Hydrocarbons Midstream,* supra *note* 19, at 7–18 (Chapters 1 and 2).

than a fraction of current and projected near-term biofuel demand.[79] Abundant evidence supports these biofuel feedstock supply[80] and demand[81] findings.

Second, processing vegetable oil feedstocks boosts biorefinery process hydrogen demand. The Project will require more hydrogen per barrel feed than crude refining because of the need to deoxygenate the uniformly high-oxygen biomass feeds proposed here. However, the additional need to saturate more carbon double bonds in the plant oils that the Project could process[82] drives the process hydrogen demand substantially above that of processing livestock fats, such as tallow.[83] This is pertinent to environmental review of the Project because process hydrogen demand contributes to certain emission impacts.

CBE-14

[79] *See* Karras, *Changing Hydrocarbons Midstream*, *supra* note 19, at 14, tbl.1; Karras, *Unsustainable Aviation Fue*l, *supra* note 19, at 30, tbl.7.

[80] *See generally* R.D. Perlack & B.J. Stokes, U.S. Dep't of Energy, *U.S. Billion-Ton Update: Biomass Supply for a Bioenergy and Bioproducts Industry* (No. DOE/EE-0363) (Aug. 2011), https://doi.org/10.2172/1219219. (US-produced supply of feedstocks, and of livestock fats, for hydro-processing esters and fatty acids (HEFA) in 2030); U.S. Dep't of Agriculture ERS, Oil Crops Data-Yearbook Tables (last updated Oct. 18, 2021), https://www.ers.usda.gov/data-products/oil-crops-yearbook/oil-crops-yearbook/#All%20Tables; Jogeir Toppe, Food and Agriculture Organization of the United Nations (FAO), *Farmed Fish: A Major Providor or a Major Consumer of Omega-3 Oils?*, https://www.fao.org/in-action/globefish/fishery-information/resource-detail/en/c/338773 (last visited Feb. 1, 2022; Knoema, *World Data Atlas: Agriculture - Tallow Production in the World*, https://knoema.com/data/agriculture-indicators-production+tallow (last visited Feb. 1, 2022).

[81] In addition to proposed Paramount capacity, see Rodeo Renewed Project DEIR, *supra* note 20; Martinez Refinery Renewable Fuels Project DEIR, *supra* note 20, at 3.3-41; Gordon Schremp, Presentation at BAAQMD Board of Directors Special Meeting: Transportation Fuels Trends, Jet Fuel Overview, Fuel Market Changes & Potential Refinery Closure Impacts, May 5, 2021 available in Board Agenda Presentations Package at 31–78, https://www.baaqmd.gov/-/media/files/board-of-directors/2021/bods_presentations_050521_revised_oppdf.pdf?la=en; Chris Malins & Cato Sandford, *Animal, Vegetable or Mineral (Oil)? Exploring the Potential Impacts of New Renewable Diesel Capacity on Oil and Fat Markets in the United States* (Jan. 17, 2020), https://theicct.org/publication/impact-renewable-diesel-us-jan22.

[82] Palm oil, if used at all, would not provide the project LCFS credit due to deforestation and climate sink impacts, and as shown by data cited above, fish oil supply is limited to at best a small fraction of potential biorefining feeds.

[83] *See* Karras, *Changing Hydrocarbons Midstream*, *supra* note 19, at A10 tbl.A1, and the original sources cited therein: Satyarthi et al., An overview of catalytic conversion of vegetable oils/fats into middle distillates, Catal. Sci. Technol. (2013), https://doi.org/10.1039/C2CY20415K; Tulcan et al., Analysis of Physical Characteristics of Vegetable Oils, CIGR–International Conference of Agricultural Engineering, Brazil (Aug 31 to Sept. 4, 2008), https://www.osti.gov/etdeweb/servlets/purl/21512209; Han et al., 2013. *Bioresource Technology* 150: 447–456. http://dx.doi.org/10.1016/j.biortech.2013.07.153; Giakoumis, Analysis of 22 vegetable oils' physico-chemical properties and fatty acid composition on a statistical basis, and correlation with the degree of unsaturation, Renewable Energy, Vol. 126: 403–419 (2018), https://doi.org/10.1016/j.renene.2018.03.057; Phillips, Implications of Imported Used Cooking Oil (UCO) as a Biodiesel Feedstock, The Bioeconomy Consultants: NNFCC (May 2019), https://www.nnfcc.co.uk/files/mydocs/UCO%20Report.pdf; Canale et al., Oxidation of vegetable oils and its impact on quenching performance, Int. J. Materials and Product Technology (2015), https://dx.doi.org/10.1504/IJMPT.2005.007943; Zhao et al., 2017. *Catalysts* 7, 83. DOI: 10.3390/catal7030083; Shurson et al., Evaluating the quality of feed fats and oils and their effects on pig growth performance, J. of Animal Science and Biotechnology (2015), https://doi.org/10.1186/s40104-015-0005-4; Kerr et al., Lipid digestibility and energy content of distillers' corn oil in swine and poultry, J. Anim. Sci. (2016), https://doi.org/10.2527/jas.2016-

Finally, process hydrogen demand is tied to GHG and flare emission impacts. The proposed "gray" hydrogen production plant—which would use fossil fuel gas steam reforming technology—is an extremely carbon intensive process that emits roughly ten tons of carbon dioxide per ton of hydrogen produced.[84] Thus, feedstocks that require more hydrogen to process per barrel input to produce biofuels.[85] This increased process hydrogen intensity also has reasonable potential to increase the frequency and magnitude of episodic air pollution from flaring incidents.[86] Further evidence for this potential flaring impact is discussed in Section IV.a below.

CBE-14

0440; Altun et al., 2010. *Int. Journal of Engineering Research and Development* Vol. 2, No. 2; Vingering et al., Fatty acid composition of commercial vegetable oils from the French market analysed using a long highly polar column, OCL (2010), http://dx.doi.org/10.1051/ocl.2010.0309; Orsavova et al., 2015. *Int. J. Mol. Sci.* 16: 12871–12890. DOI: 10.3390/ijms160612871; Awogbemi et al., Comparative study of properties and fatty acid composition of some neat vegetable oils and waste cooking oils, International J. of Low-Carbon Tech. (2019), https://doi.org/10.1080/01430750.2019.1594377; Rezaei et al., Fractionation of Iranian Beef Tallow - Chemical and Physical Evaluations of the Fractions, J. of Food Biosciences and Tech. (2013), https://jfbt.srbiau.ac.ir/article_1373_ff573a8ec1ea9f224715ae0f57fcaa47.pdf; Bitman, 1976. *In* Fat Content and Composition of Animal Products: Proceedings of a Symposium. National Academy of Sciences; https//doi.org/10.17226/22; Cal. EPA and Cal. Air Resources Board, Low Carbon Fuel Standard Tier 2 Pathway Application, Kern Oil & Refining Co. (5038), Kern Oil & Refining Co. (80105), Bakersfield, California, Appl. No. B0079 (May 2020); Nat'l Renderers Ass'n, Pocket Information Manual A Buyer's Guide to Rendered Products at 20 tbl.e (2003, edited for website in 2008; adapted from Gunstone, F. 1996. Fatty Acid and Lipid Chemistry, Blackie: London, UK); *Material Safety Data Sheet: Chicken Fat;* Fatty Acid Profile. *In* Darling Ingredients, Inc.: Irving, TX. 10 July 2012; Xie et al., 2019. *Comprehensive Reviews in Food Science and Food Safety* Vol. 18. DOI: 10.1111/1541–4337.12427; Gruger, 1967. Fatty Acid Composition of Fish Oils. U.S. Dept. of Interior, Fish and Wildlife Service, Bureau of Commercial Fisheries: Washington, D.C. https://spo.nmfs.noaa.gov/content/circular-276-fatty-acid-composition-fish-oils; Moffat and McGill, 1993. Ministry of Agriculture, Fisheries and Food: Torry Research Station, Aberdeen AB9 8DG. Variability of the composition of fish oils: significance for the diet. *Proceeding of the Nutrition Society* 52: 441–456. Printed in Great Britain. *After* Ackman and Eaton. 1966. Jangaard et al., 1967; Suseno et al., 2014. Fatty Acid Composition of Some Potential Fish Oil from Production Centers in Indonesia. *Oriental Journal of Chemistry* 30(3): 975–980. http://dx.doi.org/10.13005/ojc/300308; Simat et al., 2019. Production and Refinement of Omega-3 Rich Oils from Processing By-Products of Farmed Fish Species. *Foods* 8(125). DOI: 10.8890/foods8040125; Knothe and Steidly, 2009. *Bioresource Technology* 100: 5796–5801. DOI: 10.1016/j.biortech.2008.11.064; Banani et al., 2015. *J. Mater. Environ. Sci.* 6(4): 1178–1185. ISSN: 2028-2508. CODEN: JMESCN. http://www.jmaterenvironsci.com; Chhetri et al., 2008. *Energies* 1: 3-8. ISSN 1996-1073. www.mdpi.org/energies. DOI: 10.3390/en1010003; Yusuff et al., 2018. Waste Frying Oil as a Feedstock for Biodiesel Production. IntechOpen http://dx/doi.org/10.5772/intechopen.79433; Mannu et al., 2019. Variation of the Chemical Composition of Waste Cooking Oils upon Bentonite Filtration. *Resources* 8 (108). DOI: 10.3390/resources8020108; Mishra and Sharma, 2014. *J Food Sci Technol* 51(6): 1076-1084. DOI: 10.1007/s13197-011-0602-y. Wang, 2002. *In* Gunstone, ed., Vegetable Oils in Food Biotechnology. Blackwell: Oxford, UK.

[84] Karras, *Changing Hydrocarbons Midstream*, *supra* note 19; Karras, *Unsustainable Aviation Fuel*, *supra* note 19; Pingping Sun et al., *Criteria Air Pollutants and Greenhouse Gas Emissions from Hydrogen Production in U.S. Steam Methane Reforming Facilities*, 53 *Envron. Sci. Technol.*, 7103 (Apr. 30, 2019), https://doi.org/10.1021/acs.est.8b06197; Robert W. Howarth & Mark Z. Jacobson, *How Green is Blue Hydrogen?* 9 Energy Science & Engineering 1676 (Oct. 2021), https://doi.org/10.1002/ese3.956.

[85] *See* Karras, *Changing Hydrocarbons Midstream*, *supra* note 19, at 21 tbl.3; Karras, *Unsustainable Aviation Fuel*, *supra* note 19, 17 tbl.4 & 18 tbl.5 & 21 chart 1.

[86] *See* Karras, *Changing Hydrocarbons Midstream*, *supra* note 19, a 19–27 (chapter 3).

e. The Proposed Mitigation for Air Quality Impacts is Inadequate

An EIR must identify and "describe feasible measures which could minimize significant adverse impacts" caused by the proposed project.[87] Prior to approving a project where significant impacts still exist, the lead agency must ensure that it has "implement[ed] all mitigation measures unless those measures are truly infeasible."[88] The approval of "a project that did not include a feasible mitigation measure . . . would amount to an abuse of discretion" that is subject to disapproval by a court.[89] Moreover, the approved "[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments."[90] The SEIR does not adequately consider all feasible mitigation measures to reduce significant air quality impacts, and in several instances, fails to develop concrete, enforceable mitigation measures to ensure compliance.

i. The SEIR Wrongly Relies on Emissions Reduction Credits and the Retired NOx RECLAIM Program

CBE-15

The SEIR estimates the Project's daily operational air emissions but then erroneously discounts emissions using emissions reduction credits (ERCs) under Regulation XX (New Source Review) and trading credits under Regulation XX (Regional Clean Air Incentives Market) for VOC, NOx, SOx, carbon monoxide (CO), and fine particulate matter (PM).[91] Using this approach, the SEIR misleadingly concludes that operational emissions would be less than significant for VOCs, SOx, CO, PM_{10}, and $PM_{2.5}$ and NOx emissions would be significantly reduced.

However, ERCs accessed through the open market are not valid mitigation because they do not *reduce* actual emissions created by the Project—surrounding communities would continue to be exposed to toxic pollution released by the refinery. Instead, ERCs are reductions made in the *past* that would already be accounted for under the baseline. Consequently, ERCs would not reduce or otherwise mitigate emissions from the Project as required under CEQA.[92] ERCs cannot serve as a substitute to mitigating local, project-level impacts. Moreover, the ERC open market is plagued with invalid credits that are not enforceable, quantifiable, permanent, and sufficient pollution reductions to comply with federal and State law requirements. Further, the SEIR does not disclose and analyze this fact or whether the City would require an

[87] Cal Code Regs. tit. 14, § 15126.4(a)(1).
[88] *Sierra Club v. Cnty. of Fresno*, 6 Cal. 5th 502, 525 (2018).
[89] *Id*.
[90] Cal Code Regs. tit. 14, § 15126.4(a)(1)(2).
[91] SEIR at 4.2-32.
[92] Cal Code Regs. tit. 14, § 15126.4(c).

independent audit of ERCs the Project aims to use, which will ensure these reductions in fact occurred in the past.[93]

Similarly, the NOx RECLAIM program is a regional market-based program that does not reduce emissions onsite.[94] Importantly, the SEIR fails to note that in December 2020, the SCAQMD adopted Rule 1109.1 to transition all petroleum refineries and related operations (including the Paramount Refinery) out of the NOx RECLAIM program.[95] This rulemaking is in line with the agency's 2016 CMB-05 to sunset the program and transition to a command-and-control regulatory structure where refineries would be required to install pollution controls and replace high-polluting equipment to reduce emissions *onsite*.[96] The SEIR cannot rely on a regulatory program that is not designed to reduce emissions onsite and that will also no longer be in existence during the lifetime of the Project. The SEIR must propose enforceable, feasible mitigation measures to reduce NOx emissions.

CBE-15

ii. Mitigation Measure AQ-2b Is Speculative and Relies on Future Action

Under CEQA, the "[f]ormulation of mitigation measures shall not be deferred until some future time," and the details of a particular measure "may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review."[97] These details can only be postponed if the agency "(1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard

CBE-16

[93] *See, e.g.*, Nadia Steinzor & Bruce Baizel, Earthworks, *Undeserved Credit: Why Emissions Banking in California's San Joaquin Valley Puts Air Quality At Risk*, Earthworks at 26-27 (Nov. 2018), https://41p14t2a856b1gs8ii2wv4k4-wpengine.netdna-ssl.com/assets/uploads/2018/11/CA-ERC-Report-Earthworks-10-31-18.pdf (this report found that a "significant proportion of ERCs in the San Joaquin Valley Air Pollution Control District's bank appear to be invalid"); Cal. Air Resources Board Enforcement Division, *Review of the San Joaquin Valley Air Pollution Control District Emission Reduction Credit System* (June 2020), https://ww2.arb.ca.gov/sites/default/files/2020-06/SJV_ERC_FINAL_20200604.pdf (discussing shortcomings of the ERC program and recommending increased rigor of analysis to ensure credits are valid).

[94] South Coast Air Quality Management District, Regional Clean Air Incentives Market (RECLAIM), http://www.aqmd.gov/home/programs/business/about-reclaim (last visited Feb. 1, 2022).

[95] SCAQMD, Rule 1109.1 Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations (Nov. 5, 2021), https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1109-1.pdf?sfvrsn=8; SCAQMD, Agenda No. 34 (Nov. 5, 2021), http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-Nov5-034.pdf?sfvrsn=6.

[96] SCAQMD, Rule 1109.1 - NOx Emission Reduction for Refinery Equipment (Aug. 27, 2020), http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1109.1/pr1109-1-wgm-14-ab617-community.pdf?sfvrsn=22.

[97] Cal Code Regs. tit. 14, § 15126.4(a)(1)(B).

and that will considered, analyzed, and potentially incorporated in the mitigation measure."[98] These performance standards cannot be "loose or open-ended performance criteria."[99]

Mitigation Measure AQ-2b is speculative and improperly defers mitigation. Under this mitigation measure, the SEIR proposes that the Project "implement a plan to fund NOx reduction measures in the community both locally and regionally."[100] In particular, the SEIR notes that the Project proponent will "fund a program to address the potential health effects of localized and regional NOx and VOC emissions in coordination and approval by the City."[101] The mitigation measure is open-ended and creates an arbitrary short list of "potential areas" where funding *might* be used to reduce NOx and VOC emissions and does not specify specific reductions the program would achieve.[102]

The SEIR leaves the public and decisionmakers guessing as to the specific amount to be funded and how the program would be funded; it does not identify detailed criteria or performance standards to be considered by the City in approving reduction measures, nor does it specify whether there will be a public process to identify emission reduction measures that should be considered and funded. These details must be fleshed out in advance for the public and decisionmakers to weigh-in on the specifics. The SEIR does not specify any impractical or infeasible reasons preventing the refinery from conducting an assessment and setting concrete performance measures now.

CBE-16

Additionally, under this mitigation measure, the SEIR proposes that the Project will "make available to residences within 200 feet of the refinery fence line portable indoor air filters, or equivalent, which are equipped with HEPA and activated carbon filters and a minimum flow rate of 400 cfm, with a maximum number of filters per household of 2."[103] The SEIR, however, fails to provide any evidence or explanation supporting its use of a 200 feet radius for affected residents to qualify for air filters. Indeed, as noted above, the cumulative impacts analysis considered a *two-mile* radius. This mitigation measure also ignores schools and other sensitive receptors, as well as businesses, near the Project.

Further, VOCs are known to travel long distances after release, with VOCs with higher atmospheric lifetimes traveling the furthest.[104] Thus, substantial evidence confirms that

[98] *Id*.
[99] *Rialto Citizens for Responsible Growth v. City of Rialto* 208 Cal. App. 4th 899, 945 (2012).
[100] SEIR at ES-10, 4.2-35, 4.11-13.
[101] SEIR at 4.2-35.
[102] *Id*.
[103] *Id*.
[104] Aiswarya Ragothaman & Wiilliam A. Anderson, *Air Quality Impacts of Petroleum Refining and Petrochemical Industries*, 4 Environments at 4–5 (Sept. 2017), https://doi.org/10.3390/environments4030066; *see also,* Regina

harmful VOCs like methane, ethane, and benzene can travel large distances from the original source and impact community members and the environment well beyond 200 feet. At a minimum, the SEIR should consider a broader distribution of portable air filters *and* should provide filter replacements for at least the warranty period of the air purifier, which would be an expense residents would have to incur due to the Project. Additionally, nearby schools, among other sensitive receptor locations, and businesses should also be provided with indoor air filtration.

CBE-16

iii. Mitigation Measure AQ-1a Is Inconsistent and Has Unlawful Loopholes

During construction, the SEIR requires "the use of zero-emissions (ZE) or near-zero emissions (NZE) trucks (e.g., material delivery trucks and soil import/export), such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr)."[105] However, after setting this requirement, the SEIR then states that the Project proponent must "[a]t a minimum, require that truck operator(s)/construction contractor(s) commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks."[106]

CBE-17

The SEIR allows for a substantial deviation from the NOx emission standard of 0.02 g/bhp-hr initially prescribed without any substantial evidence or explanation, effectively rendering that mitigation measure optional and unenforceable. Additionally, the SEIR fails to disclose that all trucks must be 2010 or newer by January 1, 2023, so the Project is not going above and beyond to make the necessary reductions but rather committing to following the minimum standard already required by law.[107] The failure to make this disclosure is misleading to the public and decisionmakers. The Project should be required to meet the most stringent standard that is identified in the SEIR as feasible mitigation.

Further, this mitigation measure is in direct contradiction with Mitigation Measure AQ-2a, which *requires* 2017 model year or newer for daily operations at the refinery.[108] As the SEIR

Montero-Montoya et al., Volatile Organic Compounds in Air: Sources, Distribution, Exposure and Associated Illnesses in Children, 84 Annals of Global Health, 225, 226 (July 2008), https://doi.org/10.29024/aogh.910/ (discussing how VOCs' "physical and chemical properties and mean lifetime in the atmosphere, which ranges from a few minutes to several months, allow them to travel large distances from the source of emission and to enter the body").

[105] SEIR at 4.2-23; Cal. Air Resources Board, Optional Low NOx Certified Heavy-Duty Engines, https://ww2.arb.ca.gov/sites/default/files/classic/msprog/onroad/optionnox/optional_low_nox_certified_hd_engines.pdf (list of trucks certified to meet the 0.02 g/bhp-hr standard).

[106] SEIR at 4.2-23.

[107] Cal. Air Resources Board, A Guide to California's Clean Air Regulations for Heavy-Duty Diesel Vehicles (Feb. 2020), https://ww2.arb.ca.gov/sites/default/files/truckstop/pdfs/truck_bus_booklet.pdf.

[108] SEIR at 4.2-35.

notes, "the refinery may be able [to] have some influence over the type of trucks utilized for the Project via negotiating terms in the contracts with the trucking companies."[109] The SEIR fails to provide any information or analysis explaining why newer trucks and a lower standard should be required for daily operations but not during Project construction. Undoubtedly, the Project would have the same influence and control over construction operations.

Finally, the SEIR creates an unlawful exemption from mitigation requirements for on and off-road construction equipment by allowing the Project to use high polluting equipment.[110] This loophole allows the Project to use high emitting equipment if it has "attempted in good faith and due diligence to lease the vehicle or equipment that would comply with this policy, but that vehicle or equipment is not available . . . within a 200 mile radius."[111] If exemption conditions are met, the Project "contractor shall provide the next cleanest piece of equipment or vehicle" from Table A, which includes high polluting equipment.[112] CBE-17

Rather than require the project to modify its construction timeline and plans until it can secure the necessary equipment to avoid adverse impacts to surrounding communities and air quality, the SEIR creates an *incentive* for the Project proponent to cut costs and increase emissions by using old, high-polluting construction equipment (e.g., trucks with 1998 engines). These exceptions render these mitigation measures meaningless and voluntary, in addition to being difficult to enforce by the City. The SEIR must remove these loopholes and require the Project to *implement* all identified feasible mitigation measures.

iv. The SEIR Ignores a Range of Other Feasible Mitigation Measures

The SEIR is required to "describe feasible measures which could minimize significant adverse impacts" caused by the Project.[113] Although the SEIR is not required to "adopt every nickel and dime mitigation [measure],"[114] it should have considered all feasible and effective mitigation measures.[115] The SEIR fails to consider several feasible mitigation measures to reduce the Project's significant environmental impacts. CBE-18

First, the SEIR proposes to require a lower leak rate for light liquid valves and flanges at the refinery but does not consider requiring other best available control technology (BACT), such as leakless valves and other components, to minimize or prevent leaks from occurring in

[109] *Id*.
[110] SEIR at 4.2-25.
[111] *Id*.
[112] SEIR at 4.2-26.
[113] Cal Code Regs. tit. 14, § 15126.4(a)(1).
[114] *San Franciscans for Reasonable Growth v. City & Cnty. of S.F.*, 209 Cal. App. 3d 1502, 1519 (Ct. App. 1989).
[115] *Concerned Citizens of S. Cent. L.A. v. Los Angeles Unified Sch. Dist*., 24 Cal. App. 4th 826, 841 (1994).

the first place.[116] Notably, this lower leak rate mitigation measure does not appear in the mitigation monitoring and reporting program in the SEIR.[117]

Second, the SEIR fails to require any zero emission options for on and off-road construction equipment and for trucks for daily operations.[118] Instead, the SEIR makes the use of zero-emissions equipment and trucks *optional* despite being readily available in the open market.[119] The SEIR should make zero emission equipment and trucks a requirement for the Project to reduce toxic diesel emissions, including NOx and PM. CBE-18

Finally, the Project proposes the installation of new heaters and continued use of existing boilers.[120] The SEIR fails to consider the installation of industrial fossil fuel free, electric heaters and boilers despite technology being readily available to reduce emissions.[121] Again, the SEIR should explain with substantial evidence why electric options cannot be incorporated into the Project to reduce emissions.[122]

f. The SEIR Fails to Disclose and Analyze the Refinery's Full Compliance History CBE-19

[116] SEIR at 4.2-20; *see* U.S. EPA, Leak Detection and Repair: A Best Practices Guide (2014), https://www.epa.gov/sites/default/files/2014-02/documents/ldarguide.pdf (discussing the use of leakless valves - such as bellows valves and diaphragm valves - to reduce emissions); U.S. EPA, National Enforcement Investigations Center (NEIC): Field Science (last updated June 11, 2021), https://www.epa.gov/enforcement/national-enforcement-investigations-center-neic-field-science; *see also Covington v. Great Basin Unified Air Pollution Control Dist.*, 43 Cal. App. 5th 867, 883 (2019) (finding EIR insufficient for failing to adequately consider and analyze leakless or low-leak technology for components as feasible mitigation).

[117] SEIR at 7-5.

[118] *See* SEIR at 4.2-24, 4.2-35.

[119] *See, e.g.*, Murray Slovick, *The Age of Zero-Emissions Heavy-Duty Trucks Begins*, Electronic Design (Feb. 12, 2021), https://www.electronicdesign.com/markets/automotive/article/21155025/electronic-design-the-age-of-zeroemissions-heavyduty-trucks-begins (discussing the significant increase in zero-emissions freight vehicles being produced by various companies); *Biggest Zero-Emission Trucks Hit Market At Accelerating Rate, Boast Impressive Ranges*, Global Commercial Vehicle Drive To Zero (May 18, 2021), https://globaldrivetozero.org/2021/05/18/biggest-zero-emission-trucks-hit-market-at-accelerating-rate-boast-impressive-ranges-5-18-21/ (describing how the "number of available and announced models of new ZE heavy-duty trucks is expected to grow from 40 to 71 in the United States, Canada, China and Europe between 2020 and 2023 – a nearly 80 percent increase over just three years."); Coalition for A Safe Environment, *Zero Emission Transportation Vehicles, Cargo Handling Equipment, Construction Equipment & Ship/Boat Commercial Availability Survey* (January 20, 2022).

[120] SEIR at 2-19.

[121] *See, e.g.*, Babcock Wanson, *Industrial Electric Boilers*, https://www.babcock-wanson.com/product-category/industrial-electric-boilers/ (last visited Jan. 24, 2022); R.F. MacDonald Co., *Electric Boilers*, https://www.rfmacdonald.com/products/boiler-types/electric/ (last visited Jan. 24, 2022).

[122] *See, e.g.*, New Jersey Dep't of Envtl. Protection, Proposed Rule N.J.A.C. 7:27F at 41, https://www.nj.gov/dep/rules/proposals/20211206a.pdf (rulemaking to address greenhouse gas emissions by, in part, requiring facilities that are seeking a permit for a new fossil fuel-fired boiler to demonstrate that a fossil fuel free heating mechanism is infeasible).

In describing the refinery's compliance history, the SEIR references notices of violations issued by the SCAQMD.[123] The SEIR, however, fails to disclose and analyze compliance history from the California Air Resources Board and the United States Environmental Protection Agency (U.S. EPA).[124] A close inspection of U.S. EPA data, for example, reveals other significant violations impacting air quality and public health and safety that should be considered in evaluating the extent of non-compliance and necessary measures to monitor the Project's compliance with mitigation mandates.[125] Moreover, disclosing this information is relevant to inform the SEIR's cumulative impact analysis and the additional burdens that excess emissions from permit requirements and regulatory deviations have on nearby communities.

CBE-19

IV. The Hazardous Materials Impacts Analysis Under the SEIR Is Inadequate

a. The SEIR Fails to Disclose and Analyze the Potential Increased Flaring Hazards

The Project includes the installation of "a new flare and vapor recovery system, which will be balanced with the existing flare and vapor recovery system to serve existing and new processing units and new Hydrogen Generation Unit."[126] The SEIR, however, fails to disclose and analyze the potential for increased flaring from the additional feedstock and other malfunctions during operations that are likely to occur.[127]

CBE-20

As noted in the SEIR, processing this feedstock to produce biofuels requires significant quantities of hydrogen (i.e., about 50 million standard cubic feet per day).[128] Increased heat results from the need to remove oxygen from fatty acids in the biofuel feed and to saturate the carbon atoms in that feed to remove oxygen, which requires bonding oxygen and carbon with

[123] SEIR at 4.2-14.
[124] *See, e.g.*, Cal. Air Resources Board and AltAir Paramount Settlement Agreement (Nov. 30, 2020), https://ww2.arb.ca.gov/sites/default/files/2020-12/altair_paramount_llc_sa_r.pdf.
[125] U.S. EPA, ECHO, Detailed Facility Report, Paramount Petroleum Refinery (Facility ID 110000475940), https://echo.epa.gov/detailed-facility-report?fid=110000475940.
[126] SEIR at 2-10.
[127] *See, e.g.*, John Cook, *Explosion at Imperium's Plant* The Business Journals, Dec. 2, 2009, https://www.bizjournals.com/seattle/blog/techflash/2009/12/explosion_at_imperiums_plant.html; Veselina Petrova, *Green Plains Ethanol Plant Fire*, Renewables Now, Mar. 13, 2014, https://renewablesnow.com/news/green-plains-ethanol-plant-fire-caused-by-pump-failure-409393/; Veselina Petrova, *Biofuels Refinery in New Mexico Explodes*, Renewables Now, May 28, 2014, https://renewablesnow.com/news/rio-valley-biofuels-refinery-in-new-mexico-explodes-422745/; *Four Injured in Biofuels Plant*, HazardEx, Sept. 4, 2015, https://www.hazardexonthenet.net/article/105154/Four-injured-in-US-biofuels-plant-explosion-and-fire.aspx; Tsvetomira Tsanova, *New Fire Erupts at REG*, Renewables Now, Sept. 7, 2015, https://renewablesnow.com/news/new-fire-erupts-at-renewable-energy-groups-louisiana-biorefinery-491706/; OSHA, *OSHA Cites South Dakota Refinery*, Nov. 3, 2016, https://www.osha.gov/news/newsreleases/region8/11032016; UPM Biofuels, *Fire at UPM*, Oct. 5, 2021, https://www.upmbiofuels.com/whats-new/news/2021/05/fire-at-upm-lappeenranta-biorefinery/.
[128] SEIR at 2-2, 2-8.

significant quantities of hydrogen as a reactant. This process has the potential to generate significant amounts of heat under high pressure, creating an elevated risk of runaway exothermic reactions that could result in flaring, fires, or explosions.[129]

A recent technical report assessed explosion, fire, and flaring hazards of crude-to-biofuel refinery conversions that use the same biofuel technology proposed in this Project.[130] Introducing a new and different oil feedstock into a refinery can introduce new hazards.[131] Switching from petroleum crude to project plant and animal oil feeds would heighten these feed-switching hazards dramatically, due in large part to the presence of oxygen at high concentrations in project feeds.[132] This would introduce new corrosion, plugging, metals embrittlement and chemical reaction heat hazards into repurposed refining equipment and systems that are particularly prone to these hazards.[133]

CBE-20

Project feed hydrodeoxygenation would boost hydrogen inputs – hence substantial exothermic reaction heat – in the repurposed project hydro-conversion reactors, thus creating conditions for extremely dangerous temperature-pressure runaways to occur more frequently. By consuming more hydrogen, these process reactions generate more heat, which cracks more of the feed, consuming even more hydrogen – thus the process becomes hotter, so that the reactions feed on themselves at extremely high reactor pressures in "runaway reaction" process hazards.[134] Hydro-conversion reactor runaways are a constant risk even absent upsets or malfunctions caused by corrosion or other process hazards, which also trigger and exacerbate dangerous runaways frequently in petroleum refining.[135] The Project would worsen these hazards.

[129] Chan (Apr. 2021), *supra* note 23 (describing how renewable diesel reactions are "significantly more exothermic than petroleum diesel desulfurization reactions"); Susan van Dyk et al., *Potential Synergies of Drop-In Biofuel Production with Further Co-processing at Oil Refineries*, 13 Biofuels Bioproducts & Biorefining, 760, 765 (Feb. 12, 2019) https://doi.org/10.1002/bbb.1974 (describing how hydrotreating is an "exothermic reaction, with heat release proportional to the consumption of hydrogen" and how the oxygen removal process" has to be controlled to prevent unwanted reactions taking place").

[130] Karras, Changing Hydrocarbons Midstream, *supra* note 19.

[131] *Id.* at 22; U.S. Chemical Safety and Hazard Investigation Board, *Interim Investigation Report: Chevron Richmond Refinery Fire,* at 33–34 (Aug. 6, 2012), https://www.csb.gov/file.aspx?Documentid=5913; American Petroleum Institute, *Guidelines for Avoiding Sulfidation (Sulfidic) Corrosion Failures in Oil Refineries* at 3 (May 2009).; Robinson and Dolbear, 2007. Commercial Hydrotreating and Hydrocracking. *In:* Hydroprocessing of heavy oils and residua. Ancheyta. J., and Speight, J., eds. CRC Press. Taylor & Francis Group: Boca Raton, FL. ISBN-13: 978-0-8493-7419-7.

[132] Karras, *Changing Hydrocarbons Midstream*, *supra* note 19, at 17 tbl. A1 & 22-23.

[133] Karras, *Changing Hydrocarbons Midstream*, *supra* note 19, at 22–24; Chan (2020), *supra* note 23; Chan (2021), *supra* note 23; van Dyk et al. (2019), *supra* note 129; Robinson and Dolbear (2007), *supra* note 131.

[134] Karras, *Changing Hydrocarbons Midstream*, *supra* note 19, at 23–24; Chan (2020); Chan (2021); van Dyk et al. (2019); Robinson and Dolbear (2007).

[135] Karras, *Changing Hydrocarbons Midstream*, *supra* note 19, at 23–25; Robinson and Dolbear (2007); Greg Karras, *Causal Analysis Reports for Significant Flaring;* Reports from two refineries during the period from 2010 through

Serious and sometimes catastrophic hazard incident consequences have occurred at hydro-conversion process units repeatedly.[136] Hydro-conversion incidents occur in petroleum refining despite a frequently used partial safeguard—also used in the proposed Project—rapidly depressurizing hydro-conversion reactors to flares.[137] The underlying hazards that new biorefining process conditions could worsen manifest in significant incidents frequently, as shown by flare causal analysis.[138] Thus, flares both have proved unable to prevent every hazard incident from escalating catastrophically and have frequently resulted in acute exposures to episodic air pollution in nearby communities.[139]

CBE-20

For the reasons discussed above, the Project has reasonable potential to increase the frequency and magnitude of significant flaring impacts, and risk of refinery explosion and fire. The SEIR must disclose and analyze these significant impacts.

b. <u>The Pipeline and Hazardous Materials Safety Administration Data is Misleading</u>

The SEIR presents an onshore liquid pipeline release scenario model based on a 2,000-foot pipeline with an 8-inch diameter operating at 500 psig.[140] The SEIR fails to disclose whether existing liquid pipelines at the refinery align with the selected modeling inputs. For instance, the Project's proposed gas pipeline would be about 16-inches in diameter.[141] Without that information, the public and decisionmakers cannot evaluate the adequacy of the modeling and whether a potential release could extend further than currently projected.

CBE-21

Additionally, the SEIR presented Pipeline and Hazardous Materials Safety Administration (PHMSA) data for liquid onshore pipeline "significant incidents."[142] The data focuses exclusively on crude oil and petroleum product pipelines in California, but the refinery has been processing biofuels since at least 2016 and the Project would continue to transfer final blended product via

2020 pursuant to BAAQMD Regulation 12-12-406. Bay Area Air Quality Management District (BAAQMD): San Francisco, CA.

[136] Karras, *Changing Hydrocarbons Midstream, supra* note 19, at 24–25; Process Safety Integrity Report *Refining Incidents:* January 2018 Bayernoil Refinery Explosion, March 2017 Syncrude Fort McMurray Refinery Fire, January 2017 Sir Refinery Fire, January 2015 Petrobras (RLAM) Explosion, March 2005 BP Texas City Refinery Explosion, March 1999 Chevron Richmond Refinery Explosion, January 1997 Tosco Avon Hydrocracker Explosion, October 1992 Carson Refinery Explosion, April 1989 Chevron Refinery Fire, April 1989; March 1987 BP (Grangemouth) Hydrocracker Explosion.

[137] Karras, *Changing Hydrocarbons Midstream*, *supra* note 19,at 25; Chan (2020) and Chan (2021), *supra* note 23.

[138] Karras, *Causal Analysis Reports for Significant Flaring*, *supra* note 135, at 25–26.

[139] *Id.* at 25–27.

[140] SEIR at 4.4-13.

[141] SEIR at 2-21.

[142] SEIR at 4.4-12.

pipeline.[143] Consequently, the SEIR must disclose nationwide biofuel pipeline significant incidents to provide perspective into potential risks.

In its analysis of gas pipeline hazards, the SEIR fails to disclose PHMSA significant incidents in an apparent effort to minimize the Project's hazards related to gas pipeline operations. A review of PHMSA gas transmission data confirms that there have been *ten* fatalities and *sixty-seven* injuries because of gas transmission line significant incidents in California from 2010 to 2019.[144] The SEIR must disclose and analyze this data for the public and decisionmakers to understand the potential risks associated with installing the proposed natural gas pipeline through residential areas for use by the Project. CBE-21

c. The SEIR Fails to Disclose and Analyze the Quantity and Types of Hazards

The SEIR summarizes the anticipated inventory of hazardous materials at the refinery during the Project.[145] A closer review of this materials information reveals the inventory list is from the 2013 Hazardous Materials Business Plan (HMBP), which is well before the refinery started processing biofuels in 2016. The HMBP is generally reviewed and updated annually.[146] But the SEIR provides no explanation why it is relying on an outdated HMBP and fails to disclose and analyze whether hazardous materials have declined since 2016 and to what extent these materials and quantities would increase under the Project.[147] Indeed, the Project would involve the handling of various hazardous materials and hazardous processes, such as blending of petroleum distillates, natural gas pipelines, biofuel production, and hydrogen production, that increase the risk of potential explosions, fires, and flaring incidents. CBE-22

Further, the SEIR wrongly asserts that the Project "would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials."[148] Without substantial evidence, the SEIR also speculates that the Project "would not create a significant increased hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the

[143] SEIR at ES-6, 2-1.
[144] PHMSA, Pipeline Incident 20 Year Trends, https://www.phmsa.dot.gov/data-and-statistics/pipeline/pipeline-incident-20-year-trends (click on "Significant Incident 20 Year Trend," then search System Type: Gas Transmission, State Name: California, and Onshore); *see also* George Avalos, *PG&E's Deadly Decade After San Bruno Explosion*, The Mercury News, Sept. 9, 2020, https://www.mercurynews.com/2020/09/09/san-bruno-pge-explosion-state-senator-plans-hearings/ (describing gas pipeline rupture that killed eight people and injured fifty-eight); Doha Madani, *At Least 1 Dead, 15 Injured in Gas Explosion at California Home*, NBC News, July 15, 2019, https://www.nbcnews.com/news/us-news/least-1-dead-15-injured-gas-explosion-california-home-n1030201 (describing gas line explosion that resulted in one fatality and fifteen injuries).
[145] SEIR at 4.4-30.
[146] *See, e.g.*, Cal. Health & Safety Code § 25508.2; Cal. Health & Safety Code § 25508.
[147] *See* SEIR at 4.4-30.
[148] SEIR at 4.4-29.

environment."[149] The SEIR makes these conclusions based on modeling using the operation of the historical refinery presumably prior to biofuel production in 2016 – that is misleadingly described as "existing hazards" – rather than existing conditions (i.e., actual operations occurring at the refinery when the SEIR was prepared) to assess the proposed Project's increased hazards. This analysis is misleading to the public and decisionmakers.

Finally, the SEIR notes that the Project will result in an increase in the use of catalyst and thus an increase of spent catalyst totaling about eight tons per year.[150] The SEIR then simply notes that these increased amounts of spent catalyst will be "recycled." Spent catalysts are toxic and "pyrophoric," meaning that they have the "potential to spontaneously ignite when ... exposed to air."[151] U.S. EPA considers spent catalysts to "present a substantial hazard" and they are a frequent source of fires at reclamation facilities.[152] The SEIR must evaluate the foreseeable impacts of the Project generating increased amounts of spent catalyst, including the risks of fires and explosions at the refinery, the risks during transportation, and the risks at the reclamation facilities, as well as include information about which facilities the spent catalyst will be sent to. The SEIR's finding regarding the potential significant impacts from hazardous materials is conclusory and must be remedied to inform the public and decisionmakers. CBE-22

d. The SEIR Dismisses Hazards During the Project's Construction

The Project will require soil excavation for the construction of new foundations.[153] The SEIR confirms that the refinery has soil contamination that has ongoing remediation under Regional Water Quality Control Board oversight.[154] Despite this soil contamination, the SEIR concludes that the "impacts associated with construction activities from contaminated soils would be less than significant."[155] The SEIR makes this conclusion based on the Project's preparation of a Management Plan for Excavated Soil under SCAQMD Rules 1466 and 1403. CBE-23

The SEIR, however, fails to disclose and analyze the specific soil contamination and risks to surrounding communities. In fact, the SEIR confirms the onsite contamination is serious enough that construction workers would be provided with protective equipment.[156] The SEIR does not propose similar protections for residents and sensitive receptors near the refinery. Rather, the SEIR generally asserts without sufficient detail that the Project will follow SCAQMD rules 1466 and 1403 and the Management Plan for Excavated Soil during the excavation of soil

[149] SEIR at 4.4-31.
[150] SEIR at 4.10-19–4.10-20.
[151] 63 Fed. Reg. 42,110, 42,154 (Aug. 6, 1998).
[152] *Id*.
[153] SEIR at 4.4-34.
[154] *Id*.
[155] SEIR at 4.4-35.
[156] SEIR at 4.4-34.

at the refinery – other than some snapshot of procedures that would be implemented, the public and decisionmakers are left to guess as to the full scope of protections those regulations and the plan would provide and whether these would be adequate for the proposed Project or if other measures should be considered.[157] Indeed, the SEIR fails to even provide a copy of the proposed Management Plan for Excavated Soil referenced in the SEIR.

There are several feasible mitigation measures the SEIR fails to consider.[158] For instance, the SEIR neglects to consider off-site household and school testing to assess whether contaminated dust and toxic pollutants are entering homes and schools near the refinery to determine whether children should be inside; prohibiting excavation and other construction activities when wind speeds exceed 25 miles per hour; and creating gravel aprons or paths to minimize dust. The SEIR also fails to consider VOC and toxic dust monitoring technologies to reduce harmful exposures to nearby community members.[159] The SEIR relies and focuses solely on narrow onsite measures that will not prevent contaminated dust from migrating from the Project site to surrounding areas. The SEIR must disclose, analyze, and implement proper mitigation to ensure these hazards do not create heavier burdens on surrounding areas.

CBE-23

e. The SEIR Fails to Disclose and Analyze Impacts to Onsite Workers

The SEIR concludes that "the scope of this CEQA analysis [for hazards] is on impacts to the public, not the refinery workers or contractors, which are addressed by various OSHA and worker safety regulations."[160] The SEIR must disclose the potential hazards and impacts for onsite workers and what measures the Project will adopt to mitigate these hazards, including trainings, protective gear, and emergency measures. Ultimately, hazards for workers have the potential for offsite impacts if the Project fails to include adequate safeguards. The SEIR must disclose and analyze these worker-specific issues.

CBE-24

V. The Climate Impacts Analysis Under the SEIR Is Inadequate

CBE-25

[157] SEIR at 4.4-35.

[158] *See, e.g.*, SCAQMD, Table XI-A: Examples of Mitigation Measures of Fugitive Dust from Construction & Demolition (revised Apr. 2007), available for download at http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/fugitive-dust.

[159] *See, e.g.*, EPA, Next Generation Emission Measurement (NGEM) Research for Fugitive Air Pollution (last updated Oct. 12, 2021), https://www.epa.gov/air-research/next-generation-emission-measurement-ngem-research-fugitive-air-pollution (discussing various technologies for detecting and controlling fugitive VOC emissions); Specto-Technology, Real-time Dust Monitoring, Case Studies: SISK Group (Construction dust emissions), https://www.spectotechnology.com/product/real-time-dust-monitoring/ (describing use of monitors that "provide real-time data, and enable trigger alerts for dust exceedances"); and Justin Stewart, *How to Use Boundary Monitoring to Control Jobsite Hazards*, Construction Business Manager (Mar. 12, 2020), https://www.constructionbusinessowner.com/technology/how-use-boundary-monitoring-control-jobsite-hazards (discussing the importance of using site boundary monitors to minimize environmental and public health harms).

[160] SEIR at 4.4-1.

a. The SEIR Fails to Disclose and Analyze Current Greenhouse Gas Emissions

As discussed above, the SEIR relies on a 2011 baseline to analyze GHG emissions and climate impacts related to the Project.[161] The SEIR, however, fails to disclose and analyze GHG emissions from the refinery since modifying its operations in 2016 and whether those would be *lower* than the selected 2011 baseline. The 2011 baseline estimates 151,822 MTCO2e per year – which would be lower under current conditions – and serves to obfuscate the actual climate impacts from this Project.[162] In fact, data from 2020 shows that the refinery emitted 24,807 MTCO2e.[163] Consequently, the Project's net increase would result in far more significant GHG impacts than what is being presented under the SEIR, but the public and decisionmakers lack the necessary information and are left to speculate.

CBE-25

b. The SEIR Fails to Disclose and Analyze Climate Impacts from Feedstock

The SEIR fails to disclose and analyze how the process of refining biofuel feedstocks is significantly more carbon intensive than crude oil refining.[164] For instance, a 2016 study commissioned by the European Union found that biodiesel on average emits about two times more GHG emissions than fossil fuels.[165] The increased GHG emissions are in part the result of converting carbon sinks like grasslands and forests into croplands diverted to biofuels.[166]

CBE-26

[161] SEIR at 4.3-17 tbl.4.3.2.
[162] See, e.g., Section III.a detailing that the refinery ceased processing crude oil from October 2011 to September 2017 when it closed permanently.
[163] Cal. Air Resources Board, Mandatory GHG Reporting – Reported Emissions, 2020 GHG Emissions Data, 2020 GHG Facility and Entity Emissions, available for download at https://ww2.arb.ca.gov/mrr-data.
[164] *See, e.g.*, Searchinger, T. et al., *Use of U.S. Croplands for Biofuels Increases Greenhouse Gases Through Emissions from Land Use Change*. Science, 2008, 319, 1238, https://science.sciencemag.org/content/319/5867/1238 (article noting that the use of "good cropland to expand biofuels will probably exacerbate global warming" and noting flaws of previous accountings of GHG benefits of biofuels); *see also* Pörtner, H.O.,et al., Scientific Outcome of the IPBES-IPCC Co-Sponsored Workshop on Biodiversity and Climate Change, IPBES Secretariat (June 2011) https://www.ipbes.net/events/ipbes-ipcc-co-sponsored-workshop-report-biodiversity-and-climate-change.
[165] Globiom, The New Basis for EU Biofuel Policy 2021-2030, at 10-11, https://www.transportenvironment.org/wp-content/uploads/2021/07/2016%2004%20Globiom%20webinar.pdf.
[166] *See, e.g.*, J. Fargione et al., Land Clearing and the Biofuel Carbon Debt, 319 Science (Feb. 29, 2008), https://www.science.org/doi/10.1126/science.1152747 (finding that "[c]onverting rainforests, peatlands, savannas, or grasslands to produce food crop-based biofuels in Brazil, Southeast Asia, and the United States creates a 'biofuel carbon debt' by releasing 17 to 420 times more CO2 than the annual greenhouse gas (GHG) reductions that these biofuels would provide by displacing fossil fuels"); Hyungtae Kim et al., Biofuels, Land Use Change, and Greenhouse Gas Emissions: Some Unexplored Variables, 43 Environ. Sci. Technol. (2009) 43, 961-967, https://pubs.acs.org/doi/10.1021/es802681k. (discussing the "payback period" — or the time it takes for biofuels to overcome the carbon debt incurred due to land use changes - and variables that impact the length of this period); Emily Cassidy, Envtl. Working Group, *Ethanol's Broken Promise: Using Less Corn Ethanol Reduces Greenhouse Gas Emissions* at 4 (May 2014), https://static.ewg.org/reports/2014/ethanol_broken_promise/pdf/ethanol_broken_promise_ewg_2014.pdf?_ga=2.119196234.2101745258.1535661702-1011223048.1532525647.

Moreover, the SEIR fails to consider foreseeable land use changes that would result from increased demand for vegetable oil domestic production and imports.[167] The SEIR does not provide any information as to where this feedstock would be sourced or the harms that would result from converting land to grow feedstock.[168] For instance, converting natural habitat to cropland is often accompanied by the use of pesticides and fertilizers that then pollute water bodies and drinking water sources and harm local wildlife.[169] These effects are especially severe in countries that are growing a large percentage of the crops for feedstock, such as Brazil and Indonesia.[170] If approved, this Project will contribute to these global harms that impact the climate, air, and water. A comprehensive assessment of these foreseeable impacts should be completed so that the public and decisionmakers can fully understand the implications of allowing this Project to move forward. CBE-26

c. The SEIR's Reliance on Cap-and-Trade as Mitigation Is Inadequate

The SEIR calculates that the annual total GHG emissions from both the (amortized) construction and operations of the Project will be 1,014,760 MTCO2e.[171] The SEIR then discounts 858,571 MTCO2e based on the AB 32 cap-and-trade program that it claims would mitigate emissions from the Project's operations (e.g., trucks), except from exempted sources (i.e., ships and trains).[172] This approach is incorrect and misleading for several reasons. CBE-27

First, this summary fails to explain exactly what sources are being discounted as capped or covered emissions under cap-and-trade to arrive at the net GHG increase amount of 4,367 MTCO2e per year, which would be below the selected threshold. For instance, it is unclear what amount trains and ships contributed to the mobile sources category. This information is essential to any basis for quantifying overall climate-impact mitigation for the Project since emissions from producing and transporting imported biomass feedstocks could be wholly exempt from the State's carbon trading scheme. The public is left to speculate about how the SEIR arrived at this total.

[167] *See* SEIR at 4.3-17 tbl.4.3.2; *see also* Malins and Sandford, *supra* note 41, at 34 (concluding that to meet increased demand for renewable diesel production, annual production of vegetable oils would need to increase by millions of metric tons, including dedicating additional land to soy and canola production).
[168] *See, e.g.*, Karras, Unsustainable Aviation Fuel, *supra* note 19, at 23-26 (discussing climate impacts related to use of feedstocks for HEFA jet fuel production, including land degradation and fishery depletion).
[169] Rose Garr & Sheila Karpf, B*urned: Deception, Deforestation and America's Biodiesel Policy, Mighty Earth and Action Aid* at 8 (2018), https://www.actionaidusa.org/wp-content/uploads/2018/01/AAUSA_MightyEarth_Burned_FINAL_web.pdf.
[170] Chris Malins, Biofuel to the Fire: *The Impact Of Continued Expansion Of Palm And Soy Oil Demand Through Biofuel Policy*, Rainforest Foundation Norway (2020), https://d5i6is0eze552.cloudfront.net/documents/RF_report_biofuel_0320_eng_SP.pdf.
[171] SEIR at 4.3-17 tbl.4.3.2.
[172] *Id*.

Second, the SEIR selects a threshold of 10,000 MTCO2e/year established as an *interim threshold* by SCAQMD in 2008 over a *decade* ago for projects where SCAQMD is the lead agency.[173] Since 2008, the climate crisis has worsened, requiring more drastic action to reduce GHG emissions.[174] The SEIR fails to provide substantial evidence supporting the adequacy of SCAQMD's GHG emissions reduction targets and thresholds under these worsening climate conditions. Moreover, the SEIR fails to disclose that as of 2017, the Legislature removed SCAQMD's authority to regulate GHG emissions from sources in the cap-and-trade program through at least 2031.[175]

CBE-27

Third, the SEIR does not detail the types of offsets it would secure and how it will ensure offsets would be real, quantifiable, permanent, verifiable, and enforceable.[176] Indeed, offsets often overestimate actual reductions and have the potential to increase GHG emissions.[177] Importantly, the SEIR also fails to consider site-specific measures rather than offsets that could be outside of the State or country to reduce emissions.

Fourth, the SEIR appears to discount mobile source GHG emissions from third parties, such as construction and vendors, without an explanation as to whether those third-party operators are covered under or required to reduce or offset emissions under the cap-and-trade

[173] SCAQMD, Greenhouse Gases (last visited Jan. 25, 2022), http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2; *see also* SCAQMD, Board Meeting Agenda No. 31 (Dec. 5, 2008), http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2.

[174] *See, e.g.*, Intergovernmental Panel on Climate Change, *Climate Change 2021: The Physical Science Basis, Summary for Policymakers* (Oct. 2021), https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM_final.pdf (report describing increased severity of climate change impacts and importance of reducing GHG emissions); NASA, Global Temperature: Global Land-Ocean Temperature Index (last updated Jan. 13, 2022), https://climate.nasa.gov/vital-signs/global-temperature/ (showing that from 2008 to 2021, average global temperature anomalies reported from surface air and sea surface temperatures haves increased 0.31 degrees Celsius).

[175] Assembly Bill No. 398 (2017), https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB398.

[176] Cal. Air Resources Board, Cap-and-Trade Regulation Instructional Guidance, Chapter 1: How Does the Cap-and-Trade Program Work? at 12 (Sept. 2012), https://ww2.arb.ca.gov/sites/default/files/cap-and-trade/guidance/chapter1.pdf.

[177] Barbara Haya et al., *Managing Uncertainty in Carbon Offsets: Insights from California's Standardized Approach*, at 6–7; 21 (Stanford Law School ENRLP Program Working Paper, (2019), https://www-cdn.law.stanford.edu/wp-content/uploads/2015/03/Managing-Uncertainty-in-Carbon-Offsets-SLS-Working-Paper.pdf (finding that "even the most careful and conservative program design and oversight process will result in significant uncertainty in true emissions reductions"); Emily Benson & Catherine Puga, *All That Glitters Is Not Green*, Center for Strategic and International Studies, at 5 (Sept. 2021), https://csis-website-prod.s3.amazonaws.com/s3fs-public/publication/210928_Benson_Glitters_NotGreen.pdf?oVqmNMptGHVWATNOTOq_VwKr0RY96SHD; Lisa Song & James Temple, *The Climate Solution Actually Adding Millions of Tons of CO2 Into the Atmosphere*, ProPublica (Apr. 29, 2021), https://www.propublica.org/article/the-climate-solution-actually-adding-millions-of-tons-of-co2-into-the-atmosphere.

program.[178] Because the Project would drive those emissions, they must be addressed directly on site through the adoption of mitigation measures.

Finally, even if the cap-and-trade program was adequate mitigation, the program expires in 2030 (less than ten years) – the operational and amortized construction emissions are calculated for over 30 years under the SEIR.[179] There is no indication that the program will be renewed by the Legislature. The Project fails to disclose this fact to the public and decisionmakers and does not propose any contingencies to mitigate GHG emissions when the program expires.

CBE-27

VI. The Alternatives Analysis Under the SEIR Is Inadequate

The environmental impact report must "consider and analyze [a reasonable range of] project alternatives that would reduce adverse environmental impacts."[180] The agency must consider all feasible alternatives or those that are "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors."[181] Both the selection and analysis of alternatives are informed by "a clearly written statement of objectives" established by the lead agency.[182] In rejecting an alternative for not meeting project objectives or because it is infeasible, the agency must support its decision with substantial evidence.[183] The project objectives, however, cannot be *artificially narrow* to prevent an agency from adequately considering alternatives to achieve the project's purpose.[184] The alternatives analysis under the SEIR fails to meet these CEQA standards.

a. Objectives are Overly Narrow and Preclude Consideration of Alternatives

CBE-28

The SEIR states that the purpose of the Project is to eliminate crude oil feedstock to convert the remainder of the refinery into a "renewable biofuels production facility."[185] Not only is this stated purpose misleading given that crude oil processing at the refinery has been permanently shutdown since September 2017, but the SEIR also establishes ten unreasonably

[178] SEIR at 4.3-17– 4.3-18.
[179] Center for Climate and Energy Solutions, *California Cap and Trade*, https://www.c2es.org/content/california-cap-and-trade/#:~:text=Starting%20in%202015%2C%20the%20program,percent%20from%202021%20through%202030 (last visited Jan. 25, 2022); Jason Ye, Center for Climate and Energy Solutions, *Summary of California's Extension of Its Cap-and-Trade Program*, (Aug. 2017), https://www.c2es.org/wp-content/uploads/2017/09/summary-californias-extension-its-cap-trade-program.pdf.
[180] *In re Bay-Delta etc.*, 43 Cal. 4th 1143, 1163 (2008); Cal Code Regs. tit. 14, § 15126.6.
[181] Cal. Pub. Res. Code § 21061.1.
[182] Cal Code Regs. tit. 14,§ 15124(b).
[183] *Rialto Citizens for Responsible Growth*, 208 Cal. App. 4th at 949.
[184] *N. Coast Rivers All. v. Kawamura*, 243 Cal. App. 4th 647, 668 (2015).
[185] SEIR at ES-4.

narrow project objectives that ensure the Project as proposed will be selected over other environmentally superior alternatives. In effect, the SEIR predetermines the outcome and improperly reduces CEQA "to a process whose result will be largely to generate paper, to produce an EIR that describes a journey whose destination is already predetermined."[186]

In particular, the SEIR notes that an objective is to "[p]roduce hydrogen on-site" that closes the door to alternatives that would maintain existing hydrogen levels delivered by pipeline and ensures that a natural gas pipeline will be constructed; "use of renewable fuel gases to operate the refinery's heaters and boilers" to close the door on alternatives that use electric zero emissions options; use of "technical grade tallows and vegetable oils" including "lower grade fats, greases, and oils" that closes the door on other feedstock options; and "increase the production of renewable fuels" to eliminate a reduced throughput option as an alternative.[187] Through this approach, the SEIR improperly ensures no other option would meet these objectives, other than the Project as proposed.

CBE-28

b. Fails to Adequately Consider a Reduced Refinery Throughput Alternative

The SEIR proposes a Reduced Refinery Throughput Alternative that would presumably discontinue use of crude oil feedstock but maintain throughput of tallow and vegetable oil at no more than 6,000 bpd.[188] Indeed, reducing the throughput would avoid the construction of additional pipelines and result in significant reductions of various environmental impacts, including air, traffic, and noise, among others.

CBE-29

Despite reducing environmental harms, the SEIR arbitrarily and without adequate explanation concludes the alternative cannot meet several Project objectives, such as reduce dependency on fossil fuels, reduce carbon intensity of fuels, and reduce emissions from trucks and airplanes. The SEIR does not provide substantial evidence and dismisses this alternative from further consideration in the environmentally superior alternative discussion.[189]

c. Fails to Adequately Consider Green Hydrogen Alternatives

The SEIR dismisses green hydrogen production alternatives. In considering electrolysis technology, the SEIR concludes that "the ability to provide more than 10x that amount of electricity for the production of hydrogen through electrolysis under this alternative is speculative and considerable infrastructure would be required in order to deliver that quantity of electricity to the refinery, including high voltage and power systems deliverable to the site,

CBE-30

[186] *Save Tara v. City of W. Hollywood*, 45 Cal. 4th 116, 135–36 (2008), as modified (Dec. 10, 2008) (quoting *Nat.Res. Def. Council v. City of L.A.*, 103 Cal. App. 4th 268, 271 (2002).
[187] SEIR at ES-5–ES-6..
[188] SEIR at 5-4.
[189] SEIR at 5-5.

which may not be deliverable to the area."[190] As a result, the SEIR notes that "this alternative has been eliminated from further consideration."[191]

The SEIR, however, fails to consider electrolysis in combination with a reduced throughput option. Instead, the SEIR analyzes this option under the assumption that the refinery would significantly increase its throughput, noting that electrolysis would generate about 21 MMSCFD or "less than half of that required for the Project."[192] The SEIR must evaluate an electrolysis approach combined with a reduced throughput option or explain why such an approach would be infeasible and fail to meet the core purpose of the Project: to support use of renewable jet fuel, gasoline, and propane. In addition, the SEIR must evaluate cost savings from Low Carbon Fuel Standard credits from reducing or eliminating gray hydrogen emissions through use of electrolysis before properly drawing feasibility conclusions regarding this alternative.

CBE-30

Finally, the SEIR asserts, without specific factual support, a 2 MW baseline for total refinery electric power demand.[193] This raises a more fundamental concern with the SEIR. Publicly available evidence from other refineries indicates that the 2 MW estimate in the SEIR is low by a factor of ten times to ninety times, based on the permanently shuttered refinery's operating and operable crude capacity in 2010–2011.[194] The SEIR assertion of this low, post-petroleum refining 2 MW baseline to reject mitigation of emission impacts via the electrolysis alternative – while estimating emission impacts against those of the refinery processing petroleum in 2011 – constitutes improper "cherry picking" among different baseline periods. Alternatively, if the SEIR actually claims this permanently closed petroleum refinery required only 2 MW of total electric power, this could represent a significant factual error in the SEIR.

d. Dismisses Alternative Natural Gas Pipelines Routes Without Adequate Analysis

CBE-31

The SEIR notes that "[a]lternative natural gas pipeline routes are possible which might reduce the severity of the potential impacts by utilizing shorted routes."[195] In an apparent

[190] SEIR at 5-11.
[191] *Id*.
[192] *Id*.
[193] *Id*.
[194] Chevron Refinery Modernization Project RDEIR, SCH# 2011062042, https://ceqanet.opr.ca.gov/Project/2011062042, at 4.6-7 (117 MW); Rodeo Renewed Project DEIR, *supra* note 20,at 4.6-196/197 (444,300 MWh/yr); Martinez Refinery Renewable Fuels Project DEIR, *supra* note 20, at 3.6-8 (1,200,000 MWh/yr) and refinery crude capacities for the Paramount refinery in 2010–2011 (53,000 b/cd), the Chevron Richmond refinery in 2014 (245,271 b/cd), the Phillips 66 San Francisco Refinery in 2019 (listed by USEIA as the Rodeo site; 120,200 b/cd) and the Marathon/Tesoro refinery in 2019 (161500 b/cd) from *Refinery Capacity Data by Individual Refinery;* reported as of January 1 annually. U.S. Energy Information Administration (EIA): Washington, D.C. https://www.eia.gov/petroleum/refinerycapacity
[195] SEIR at ES-7.

effort to undermine consideration of this alternative, the SEIR asserts that "[t]here are uncertainties associated with this alternative as the permits and ROW requirements remain somewhat speculative and negotiations with the Gas Company have not been initiated for other routes."[196] The SEIR fails to disclose and analyze whether similar uncertainties exist with other proposed routes, including the originally proposed route. Indeed, the originally proposed natural gas pipeline route would still require right of way approvals from several municipalities that have not been secured by SoCalGas.[197]

CBE-31

e. Neglects to Consider Alternative Feedstock Options for the Project

The proposed Project would use tallow and vegetable oil feedstock, which as described under Section I.f above would presumably require HEFA technology.[198] In evaluating alternatives to the Project, the SEIR fails to consider feasible alternative feedstock options that have the potential to reduce some of the Project's significant impacts. For instance, the SEIR neglects to consider and analyze cellulose biomass, such as composted yard clippings, sawdust, and cornstalk, that can serve as an alternative feedstock for the production of sustainable aviation fuel.[199] The SEIR must evaluate alternative feedstock options other than purpose-grown feedstocks, such as vegetable oil requiring hydrotreating, and whether those alternatives would minimize the Project's anticipated environmental impacts.[200]

CBE-32

f. Fails to Adequately Consider a Decommissioning Alternative

Without the proposed Project, the refinery would not continue processing crude at historic levels. The SEIR therefore should have considered an alternative to fully or partially decommission the site. In examining a range of alternatives, an EIR is required to include a "no project" alternative that allows decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the project."[201] This "no project" analysis must discuss "existing conditions," "as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved."[202] It is critical that the "no project" alternative accurately reflect the status quo absent the Project, so that the baseline for measuring project impacts is not set too high, which would artificially diminish the magnitude of Project impacts.[203] For reasons explained in Section III.a, concerning the project baseline, the

CBE-33

[196] SEIR at 5-19.
[197] SEIR at 1-9 tbl.1.3.
[198] SEIR at 2-2 tbl.2.1.
[199] Karras, Unsustainable Aviation Fuel, *supra* note 19, at 35.
[200] Malins & Sanford, *supra* note 81, at 45 (describing cellulosic biofuel as more scalable and sustainable that the Renewable Fuel Standard originally aimed to support).
[201] Cal Code Regs. tit. 14, § 15126.6(e)(1).
[202] Cal Code Regs. tit. 14, § 15126.6(e)(2).
[203] *Ctr. for Biological Diversity v. Dep't of Fish & Wildlife*, 234 Cal.App.4th 214, 253 (2014).

SEIR incorrectly identified the no project alternative as the scenario where crude oil operations would return to historic rates, continuing crude oil processing operations indefinitely at historic levels. But the SEIR does not provide evidence to support this conclusion.

The SEIR should have considered an alternative where the facility is decommissioned to meet California's air quality and greenhouse gas goals, or at a minimum provided a no project alternative reflecting the reality of the refinery's more limited tallow and vegetable oil throughput capacity of 3,500 barrels per day and the decommissioning of the rest of the facility. Any decommissioning alternative should address the environmental impacts associated with remediating the contaminated site, as addressed in Section IV.d. And, if pursued, the City should take steps to ensure that workers and former workers at the refinery can rely on family-sustaining incomes and benefits moving forward. This could include a requirement for the Project proponent to execute a decommissioning plan guided by worker-identified needs, including, for example, using current and former refinery workers wherever possible, and funding adequate pension plans for workers to retire, wage and benefit replacement when needed, and worker training and placement programs to match workers skills with good, high-road jobs in clean renewable energy and other growing sectors. Decommissioning the refinery and restoring the site to its original condition would be a yearslong, labor-intensive undertaking, capable of creating local jobs, while improving health outcomes for the surrounding community.[204]

CBE-33

VII. The Transportation Impacts Analysis Under the SEIR Is Inadequate

a. Underestimates Increases in Vehicle Miles Traveled from the Project

Under CEQA, vehicle miles traveled (VMT) considers the "amount and distance of automobile travel attributable to a project" and is generally the appropriate approach to measure transportation impacts.[205] Using this methodology, the SEIR concludes that VMT increases attributable to the Project would be less than significant.[206] In support of this conclusion, the SEIR notes the Project would only add an additional estimated 30 employees to the 100 current on-site employees for a total of 74 one-way trips.[207] However, this assertion contradicts representations made by the refinery in its State tax exclusion application noting

CBE-34

[204] Pollin, R. et al., *A Program for Economic Recovery and Clean Energy Transition in California*, Political Economy Research Institute (2021) at 80 tbl.4.4 (estimating that that every $1 million invested in pollution cleanup would result in 12.3 jobs, while ecosystem restoration would result in 18.6 jobs.), https://peri.umass.edu/publication/item/1466-a-program-for-economic-recovery-and-clean-energy-transition-in-california.
[205] Cal Code Regs. tit. 14, § 15064.3(a).
[206] SEIR at 4.8-20.
[207] *Id.*

the "Project will support a total of *136* production-related jobs" at the refinery.[208] Moreover, the SEIR fails to provide any substantial evidence supporting this level of employment at full build-out. Nor does the SEIR detail where it expects to recruit employees and where they would generally be traveling from within the region and/or whether additional jobs would be added within the Project's lifetime. The SEIR must address these deficiencies in its VMT analysis.

Additionally, the SEIR confirms that "a peak of 1,312 workers per day would be onsite."[209] The SEIR, however, fails to calculate and analyze VMTs from construction workers that would be traveling to and from the refinery during the two to three-year construction period. Recognizing the potential transportation impacts, the SEIR prescribes an unenforceable mitigation measure: construction workers would be provided with shuttle service and parking at 7770 Rosecrans.[210] But the SEIR fails to disclose the capacity of that parking lot and speculates that construction workers will use the shuttles, which would be *optional* for workers. The SEIR then proceeds to calculate project intersection impacts based on shuttle trips and concludes the Project would not create significant increases for most intersections near the refinery.[211] The SEIR's analysis is misleading to the public and decisionmakers regarding the foreseeable traffic impacts during construction.

CBE-34

b. Mitigation Measure to Address Truck Traffic Impacts Is Inadequate

The SEIR estimates that the Project will lead to an increase in 540 roundtrip trucks trips per day—that would be 23 inbound trucks per hour at peak operations.[212] The SEIR asserts without substantial evidence that the site would be able to process up to 15 trucks per hour, but confirms that as many as 31 trucks could be idling and waiting to be processed during peak hours.[213] Given the significant number of trucks that would visit the refinery, the SEIR acknowledges the potential for truck queuing along Lakewood Blvd. that could cause congestion and safety risks.[214] The SEIR, however, fails to consider that because trucks would be required to exit both the 91 and 105 freeways via Lakewood Blvd., it is foreseeable that truck congestion would occur both north and south of Lakewood Blvd. Moreover, this truck queuing could create additional hazards along the planned Lakewood Blvd. at-grade rail crossing for the West Santa Ana Branch Transit (WSABT) project, which expects to start

CBE-35

[208] Xee Moua, California Alternative Energy and Advanced Transportation Financing Authority, *Request to Approve Project for Sales and Use Tax Exclusion for Alt-Air Paramount, LLC*, Application No. 20-SM004, at 5 (Jan. 21, 2020) https://www.treasurer.ca.gov/caeatfa/meeting/2020/20200121/staff/4a3.pdf.
[209] SEIR at 4.8-19.
[210] *Id*.
[211] *Id.* at 4.8-19 tbl. 4.8.6, app.F at 22.
[212] SEIR at 4.8-21, 4.8-23.
[213] SEIR at 4.8-23.
[214] SEIR at 4.8-21.

construction in 2023.[215] The SEIR must disclose and analyze these foreseeable truck traffic impacts.

Rather than *limit* the number of daily trucks visiting the refinery to address these impacts, the SEIR prescribes inadequate mitigation to reduce traffic impacts.[216] Mitigation measure T-3a is inadequate in at least three ways. First, the Project would be required to implement procedures to open more gates as the number of trucks queuing increases, with three gates being opened when the backload reaches 15 trucks—the SEIR fails to disclose and analyze to what extent opening more gates would actually significantly reduce or eliminate the truck backlogs and the related traffic and hazards.[217] Second, diesel trucks in the queue are not prohibited from idling while waiting to be processed, which would reduce toxic diesel pollution. Finally, while the mitigation measure prohibits trucks from traveling on Somerset Blvd. west of Andry Drive to avoid at-grade crossings of the WSABT, trucks would still be allowed to exit on the 91 freeway through Lakewood Blvd., which would create the same hazards. The SEIR must consider these feasible mitigation measures, including a limit to the daily number of trucks visiting the refinery to avoid these impacts.

CBE-35

VIII. The SEIR Fails to Provide for Adequate Public Review and Comment

When preparing an EIR under CEQA, "[p]ublic participation is an essential part of the [environmental review] process."[218] In furtherance of this objective, the lead agency should make "environmental information available in electronic format on the Internet, on a web site maintained or utilized by the public agency."[219] The failure to disclose necessary information "constitutes a prejudicial abuse of discretion when the omission of relevant information has precluded informed decision making and informed public participation, regardless of whether a different outcome would have resulted if the public agency had complied with the disclosure requirements."[220] The City has failed to meet CEQA's public participation objectives.

CBE-36

For instance, the SEIR references Appendix B, Part 2 for review that provides the methodology for calculating emissions from tanks.[221] This appendix and other appendices were not combined or included with the SEIR and are not posted on the Paramount website for public access and review. Instead, members of the public would have to know to visit the

[215] Steve Hymon, *Metro Board Approves Route for Initial Segment for West Santa Ana Branch Project and Union Station as Northern Terminus,* Metro: The Source (Jan. 28, 2022), https://thesource.metro.net/2022/01/28/metro-board-approves-route-for-initial-segment-for-west-santa-ana-branch-project-and-union-station-as-northern-terminus/

[216] SEIR at 4.8-24–4.8-25.

[217] SEIR at 4.8-25.

[218] Cal Code Regs. tit. 14, § 15201.

[219] *Id.*

[220] *Bakersfield Citizens for Loc. Control*, 124 Cal. App. 4th at 1198; Cal. Pub. Res. Code § 21005(a).

[221] SEIR at 4.2-28.

CEQAnet State Clearinghouse website to locate the specific project and the SEIR and appendices.[222] The State Clearinghouse under the Governor's Office of Planning and Research is designed to facilitate review and comment by other *public agencies* rather than the public.[223]The agency is "responsible for coordinating the state-level review of [and comment on] environmental documents prepared under CEQA," including various departments, boards, and commissions.[224]

CBE-36

Although public notice generally provides "[t]he address where copies of the EIR and all documents incorporated by reference in the EIR will be available for public review," the COVID-19 pandemic and worsening conditions since the release of this draft SEIR make it necessary to provide remote, online access to these documents.[225] Consequently, the draft SEIR should be recirculated with these appendices for another round of comments after revisions and response to comments are prepared. The SEIR and appendices should be linked on the City website prepared for the Project for public review.

***

For the reasons outlined above, the City must revise and recirculate the SEIR to address serious substantive and procedural deficiencies with the environmental review and mitigation prescribed for the Project. In its current form, the SEIR fails as an informational document and is misleading to the public and decisionmakers regarding the significance and full extent of environmental impacts and other hazards this Project would create on already overburdened communities near the refinery.

Respectfully submitted,

Oscar Espino-Padron, Attorney
Shana E. Emile, Attorney
Lisa Fuhrmann, Senior Research Policy Analyst*
Earthjustice

Alison Hahm, Associate Attorney
Communities for a Better Environment

Taylor Thomas, Co-Executive Director
Whitney Amaya, Organizer
East Yard Communities for Environmental Justice

Lisa Lappin, Director
Concerned Paramount Residents Fight Pollution

[222] AltAir Renewable Fuels Conversion Project Draft SEIR, SCH Number 2020069013, https://ceqanet.opr.ca.gov/Project/2020069013.
[223] Cal Code Regs. tit. 14, § 15087(f)
[224] *Pres. Poway v. City of Poway*, 245 Cal. App. 4th 560, 569 (2016).
[225] Cal Code Regs. tit. 14, § 15087(c)(5)

Ingrid Brostrom, Assistant Director
Center on Race, Poverty & the Environment

Martha Camacho Rodriguez, Director
SEE (Social Eco Education-LA)

Liz Jones, Staff Attorney
Climate Law Institute
Center for Biological Diversity

Kaya M. Allan Sugerman, Director
Illegal Toxic Threats Program
Center for Environmental Health

*Contributed to the research and/or factual portions of this document and did not provide legal services or analysis.

References for Comments on the Draft Subsequent Environmental Impact Report for the AltAir Renewable Fuels Conversion Project (State Clearinghouse No. 2020069013)

Documents available for Bulk Download Here: https://earthjustice.sharefile.com/d-s69a4187ad412464e8fa80fb19906f6c3

Footnote Numbers	Reference
13	*Greenwashing Fact Sheet Series: Fact Sheet 4 – Biofuels*, Stay Grounded (Oct. 2021), https://stay-grounded.org/wp-content/uploads/2021/08/SG_factsheet_8-21_Biofuels_print_Lay02.pdf
19-1; 25-2; 27; 72-2; 78-1; 79-1; 83-1, 84-1; 85-1; 86; 130; 131-1; 132; 133-1; 134-4; 135-1; 136-1; 137-1	Greg Karras, *Changing Hydrocarbons Midstream: Fuel Chain Carbon Lock-In Potential of Crude-To-Biofuel Petroleum Refinery Repurposing* (prepared for NRDC, Aug. 2021)
19-2; 25-1; 76-2; 81-1; 84-2; 85-2; 168	Greg Karras, *Unsustainable Aviation Fuel: An Assessment of Carbon Emission and Sink Impacts from Biorefining and Feedstock Choices for Producing Jet Fuel in Repurposed Crude Refineries* (prepared for NRDC, Aug. 2021)
20-1; 22-1;46-2; 71-1; 76-1; 81-2; 194-2	Rodeo Renewed Project DEIR, SCH# 2020120330 (Oct. 2021, Version 2), https://ceqanet.opr.ca.gov/2020120330/3
20-2; 22-2; 71-2; 76-2; 83-2; 194-3	Martinez Refinery Renewable Fuels Project DEIR, SCH# 2021020289 (Oct. 2021), https://ceqanet.opr.ca.gov/2021020289/2
21	*Community Investigations: Rendering Plants in Vernon*, South Coast Air Quality Management District, http://www.aqmd.gov/home/news-events/community-investigations/rendering-plants (last visited Feb. 3, 2022)
23-1;133-2; 134-2; 137-2	Erin Chan, Burns & McDonnell, Converting a Petroleum Diesel Refinery for Renewable Diesel (2020)
23-2; 129-1; 133-3; 134-3; 137-2	Erin Chan, Burns & McDonnell, Converting a Petroleum Diesel Refinery for Renewable Diesel, Hydrocarbon Processing,. Apr. 2021, https://www.hydrocarbonprocessing.com/magazine/2021/april-2021/special-focus-clean-fuels/converting-a-petroleum-diesel-refinery-for-renewable-diesel.
25-1	U.S. Dep't of Energy, *Alternative Fuels Data Center: Renewable Hydrocarbon Biofuels*, https://afdc.energy.gov/fuels/emerging_hydrocarbon.html (last visited Jan. 25, 2021)
31, 32	Marsh JLT Specialty, *The 100 Largest Losses in the Hydrocarbon Industry 1974–2019 (26th ed. 2020)*, available for download at https://www.marsh.com/us/industries/energy-and-power/insights/100-largest-losses-in-the-hydrocarbon-
33	Laura Sanicola, *U.S. Refiners, Chemical Makers Pare Insurance Coverage as Accidents Boost Costs*, Reuters, Jan. 29, 2020, https://www.reuters.com/article/us-usa-refineries-insurance/u-s-refiners-chemical-makers-pare-insurance-coverage-as-accidents-boost-costs-idUSKBN1ZT0FB.
43	Stephanie Kelly, *U.S. Renewable Fuels Market Could Face Feedstock Deficit*, Reuters, Apr. 29, 2021, https://www.reuters.com/business/energy/us-renewable-fuels-market-could-face-feedstock-deficit-2021-04-09/
45-1	Janet McGurty, *Refinery News: Chevron to Co-Process Bbiofeed at El Segundo's FCC*, S&P Global Platts, Mar. 3, 2020, https://www.spglobal.com/platts/en/market-insights/latest-news/oil/030320-refinery-news-chevron-to-co-process-biofeed-at-el-segundos-fcc
45-2	Chevron U.S.A., *Chevron, Delta, Google Announce Intent to Measure SAF Emissions, Biomass Magazine*, Sept. 9, 2021, http://biomassmagazine.com/articles/18305/chevron-delta-google-announce-intent-to-measure-saf-emissions
46	Bloomberg, *Phillips 66 is Turning A California Oil Refinery Into a Biofuel Plant*, Los Angeles Times, Aug. 12, 2020, https://www.latimes.com/business/story/2020-08-12/phillips-66-oil-refinery-biofuel-plant
47-1	*Marathon Petroleum to Convert Martinez Refinery to Renewable Fuels Facility*, Biofuels Central, March 9, 2021, https://biofuelscentral.com/marathon-petroleum-convert-martinez-refinery-renewable-fuels-facility/

47-2	*GCEH's Retooled Biorefinery is on Schedule to be Operational in Q1 2022,* Global Clean Energy Holdings, https://www.gceholdings.com/production (last visited Feb. 2, 2022)
48	Comments by Asian Pacific Environmental Network, et al. regarding Marathon Martinez Refinery Renewable Fuels Project DEIR (Dec. 17, 2021)
49	U.S. Energy Information Administration, *U.S. Renewable Diesel Capacity Could Increase Due to Announced and Developing Projects* (July 29, 2021), https://www.eia.gov/todayinenergy/detail.php?id=48916
56	SCAQMD, FIND Database, Paramount Petroleum Corp. (Facility ID 800183), https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=800183 (to view AER data referenced, select 'Emissions' from the drop-down menu, then select AER Year 2011) (last visited Feb. 1, 2022)
57	SCAQMD, FIND, AltAir Paramount, LLC (Facility ID 187165) https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=187165 (to view AER data referenced, select 'Emissions' from the drop-down menu, then select AER Year 2020) (last visited Feb. 1, 2022)
59-1; 194	U.S. Energy Information Administration (EIA), *Refinery Capacity Data by Individual Refinery,* https://www.eia.gov/petroleum/refinerycapacity (reported as of January 1 annually) **[Refer to Refinery Capacity by Individual Refinery in ShareFile Link]**.
59-2; 60	U.S. EIA, *Refineries Permanently Shutdown by PAD District Between January 1, 1991 and January 1, 2021,* https://www.eia.gov/petroleum/refinerycapacity/table13.pdf.
65-1	U.S. EPA, *Enforcement Alert: EPA Observes Air Emissions from Natural Gas Gathering Operations in Violation of the Clean Air Act*, Publication No. EPA 325-F-19-001(Sept. 2019), https://www.epa.gov/sites/default/files/2019-09/documents/naturalgasgatheringoperationinviolationcaa-enforcementalert0919.pdf
65-2	U.S. EPA, Presentation for NOGC: Air Emissions from Natural Gas Pipeline Pigging Operations (Dec. 12, 2019), http://vibe.cira.colostate.edu/OGEC/docs/meetings/2019-12-12/03%20Pigging%20Dec%202019.pdf
65-3	U.S. EPA, Methane to Markets Presentation: Efficient Pigging of Gathering Lines (Jan. 17, 2007), https://www.globalmethane.org/documents/events_oilgas_20070115_15jan07-efficient_pigging_of_gathering_lines.pd
65-4	Daniel J. Zimmerle et al., Gathering Pipeline Methane Emissions in Fayetteville Shale Pipelines and Scoping Guidelines for Future Pipeline Measurement Campaigns, Elementa: Science of the Anthropocene (2017), https://doi.org/10.1525/elementa.258
72-1	Pearlson et al., A Techno-Economic Review of Hydroprocessed Renewable Esters and Fatty Acids for Jet Fuel Production, 7 Biofuels, Bioproducts & Biorefining, 89 (2013), https://doi.org/10.1002/bbb.1378.
73, 74	Fluxsense/SCAQMD, Emission Measurements of VOCs, NO2, and SO2 from the Refineries in the South Coast Air Basin Using Solar Occultation Flux and Other Optical Remote Sensing Methods (Apr. 11, 2017), http://www.aqmd.gov/docs/default-source/fenceline_monitroing/project_1/fluxsense_scaqmd2015_project1_finalreport(040717).pdf
80-1	R.D. Perlack & B.J. Stokes, U.S. Dep't of Energy, *U.S. Billion-Ton Update: Biomass Supply for a Bioenergy and Bioproducts Industry* (No. DOE/EE-0363) (Aug. 2011), https://doi.org/10.2172/1219219.
80-2	U.S. Dep't of Agriculture ERS, *Oil Crops Data-Yearbook Tables* (last updated Oct. 18, 2021), https://www.ers.usda.gov/data-products/oil-crops-yearbook/oil-crops-yearbook/#All%20Tables
80-3	Jogeir Toppe, Food and Agriculture Organization of the United Nations (FAO), *Farmed Fish: A Major Providor or a Major Consumer of Omega-3 Oils?,* https://www.fao.org/in-action/globefish/fishery-information/resource-detail/en/c/338773 (last visited Feb. 1, 2022)
80-4	Knoema, *World Data Atlas: Agriculture - Tallow Production in the World,* https://knoema.com/data/agriculture-indicators-production+tallow (last visited Feb. 1, 2022)
81-3	Gordon Schremp, Presentation at BAAQMD Board of Directors Special Meeting: Transportation Fuels Trends, Jet Fuel Overview, Fuel Market Changes & Potential Refinery Closure Impacts, May 5, 2021, available in Board Agenda Presentations Package at 31–78, https://www.baaqmd.gov/-/media/files/board-of-directors/2021/bods_presentations_050521_revised_oppdf.pdf?la=en.
81-4, 167-2, 200	Chris Malins & Cato Sandford, *Animal, Vegetable or Mineral (Oil)? Exploring the Potential Impacts of New Renewable Diesel Capacity on Oil and Fat Markets in the United States (*Jan. 17, 2020), https://theicct.org/publication/impact-renewable-diesel-us-jan22

83-2 Satyarthi et al., 2013. Catal. Sci. Technol. 3:70. DOI: 10.1039/c2cy20415k

83-3 Tulcan et al., 2008. CIGR–International Conference of Agricultural Engineering, Brazil, 31 Aug–4 Sep 2008. https://www.osti.gov/etdeweb/servlets/purl/21512209

83-4 Han et al., 2013. Bioresource Technology 150: 447–456. http://dx.doi.org/10.1016/j.biortech.2013.07.153

83-5 Giakoumis, 2018. Renewable Energy Vol. 126: 403–419. www.sciencedirect.com/science/article/abs/pii/S0960148118303689

83-6 Phillips, 2019. Implications of Imported Used Cooking Oil as a Biodiesel Feedstock. NNFCC: Heslington, NY

83-7 Canale et al., 2005. Int. J. Materials and Product Technology 24(1–4): 101–125. https://www.inderscience.com/info/inarticle.php?artid=7943

83-8 Zhao et al., 2017. Catalysts 7, 83. DOI: 10.3390/catal7030083

83-9 Shurson et al., 2015. Journal of Animal Science and Biotechnology 6.10. DOI: 10.1186/s40104=015-0005-4

83-10 Kerr et al., 2016. J. Anim. Sci. 94: 2900-2908. DOI: 10.2527/jas2016-0440

83-11 Altun et al., 2010. Int. Journal of Engineering Research and Development Vol. 2, No. 2

83-12 Vingering et al., 2010. OCL Vol. 17Nº 3 MAI-JUIN 2020. DOI: 10.1684/ocl.2010.0309. http://www.ocl-journal.org. http://dx.doi.org/10.1051/ocl.2010.0309

83-13 Orsavova et al., 2015. Int. J. Mol. Sci. 16: 12871–12890. DOI: 10.3390/ijms160612871

83-14 Awogbemi et al., 2019. International Journal of Low-Carbon Technologies 12: 417–425. DOI: 10.1093/ijlct/ctz038

83-15 Rezai and Azizinejad, 2013. Journal of Food Biosciences and Technology 3

83-16 Bitman, 1976. In Fat Content and Composition of Animal Products: Proceedings of a Symposium. National Academy of Sciences, https//doi.org/10.17226/22

83-17 Application B0079, Kern Oil & Refining. GREET Pathway for the Production of Renewable Diesel from Animal Tallow. Submitted to Cal. Air Res. Board 31 March 2020

83-18 A Buyer's Guide to Rendered Products, National Renderers Association, Inc.: Alexandria, VA. 2003. www.renderes.org. Table e

83-19 Adapted from Gunstone, F. 1996. Fatty Acid and Lipid Chemistry. Blackie: London, UK

83-20 Material Safety Data Sheet: Chicken Fat; Fatty Acid Profile. In Darling Ingredients, Inc.: Irving, TX. 10 July 2012

83-21 Xie et al., 2019. Comprehensive Reviews in Food Science and Food Safety Vol. 18. DOI: 10.1111/1541–4337.12427

83-22 Gruger, 1967. Fatty Acid Composition of Fish Oils. U.S. Dept. of Interior, Fish and Wildlife Service, Bureau of Commercial Fisheries: Washington, D.C. https://spo.nmfs.noaa.gov/content/circular-276-fatty-acid-composition-fish-oils

83-23 Moffat and McGill, 1993. Ministry of Agriculture, Fisheries and Food: Torry Research Station, Aberdeen AB9 8DG. Variability of the composition of fish oils: significance for the diet. Proceeding of the Nutrition Society 52: 441–456. Printed in Great Britain. After Ackman and Eaton. 1966. Jangaard et al., 1967

83-24 Suseno et al., 2014. Fatty Acid Composition of Some Potential Fish Oil from Production Centers in Indonesia. Oriental Journal of Chemistry 30(3): 975–980. http://dx.doi.org/10.13005/ojc/300308

83-25 Simat et al., 2019. Production and Refinement of Omega-3 Rich Oils from Processing By-Products of Farmed Fish Species. Foods 8(125). DOI: 10.8890/foods8040125

83-26 Knothe and Steidly, 2009. Bioresource Technology 100: 5796–5801. DOI: 10.1016/j.biortech.2008.11.064

83-27 Banani et al., 2015. J. Mater. Environ. Sci. 6(4): 1178–1185. ISSN: 2028-2508. CODEN: JMESCN. http://www.jmaterenvironsci.com

83-28 Chhetri et al., 2008. Energies 1: 3-8. ISSN 1996-1073. www.mdpi.org/energies. DOI: 10.3390/en1010003

83-29 Yusuff et al., 2018. Waste Frying Oil as a Feedstock for Biodiesel Production. IntechOpen http://dx/doi.org/10.5772/intechopen.79433

83-30 Mannu et al., 2019. Variation of the Chemical Composition of Waste Cooking Oils upon Bentonite Filtration. Resources 8 (108). DOI: 10.3390/resources8020108

83-31 Mishra and Sharma, 2014. J Food Sci Technol 51(6): 1076-1084. DOI: 10.1007/s13197-011-0602-y.

83-32 Wang, 2002. In Gunstone, ed., Vegetable Oils in Food Biotechnology. Blackwell: Oxford, UK.

84-3 Pingping Sun et al., *Criteria Air Pollutants and Greenhouse Gas Emissions from Hydrogen Production in U.S. Steam Methane Reforming Facilities*, 53 *Envron. Sci. Technol.,* 7103 (Apr. 30, 2019), https://doi.org/10.1021/acs.est.8b06197

84-4 Robert W. Howarth & Mark Z. Jacobson, *How Green is Blue Hydrogen?* 9 Energy Science & Engineering 1676 (Oct. 2021), https://doi.org/10.1002/ese3.956.

84-4 Nadia Steinzor & Bruce Baizel, Earthworks, *Undeserved Credit: Why Emissions Banking in California's San Joaquin Valley Puts Air Quality At Risk* at 26-27 (Nov. 2018), https://41p14t2a856b1gs8ii2wv4k4-wpengine.netdna-ssl.com/assets/uploads/2018/11/CA-ERC-Report-Earthworks-10-31-18.pdf

93-1 Cal. Air Resources Board Enforcement Division, *Review of the San Joaquin Valley Air Pollution Control District Emission Reduction Credit System* (June 2020), https://ww2.arb.ca.gov/sites/default/files/2020-06/SJV_ERC_FINAL_20200604.pdf

93-2 South Coast Air Quality Management District, *Regional Clean Air Incentives Market (RECLAIM)*, http://www.aqmd.gov/home/programs/business/about-reclaim (last visited Feb. 1, 2022).

94 SCAQMD, Rule 1109.1 Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations (Nov. 5, 2021), https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1109-1.pdf?sfvrsn=8

95-1 SCAQMD, Agenda No. 34 (Nov. 5, 2021), http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-Nov5-034.pdf?sfvrsn=6

95-2 SCAQMD, Rule 1109.1 - NOx Emission Reduction for Refinery Equipment (Aug. 27, 2020), http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1109.1/pr1109-1-wgm-14-ab617-community.pdf?sfvrsn=22.

96 Aiswarya Ragothaman & Wiilliam A. Anderson, *Air Quality Impacts of Petroleum Refining and Petrochemical Industries* , 4 Environments at 4–5 (Sept. 2017) , https://doi.org/10.3390/environments4030066

104-1 Regina Montero-Montoya et al., *Volatile Organic Compounds in Air: Sources, Distribution, Exposure and Associated Illnesses in Children* , 84 Annals of Global Health, 225, 226 (July 2008), https://doi.org/10.29024/aogh.910/

104-2 Cal. Air Resources Board, Optional Low NOx Certified Heavy-Duty Engines, https://ww2.arb.ca.gov/sites/default/files/classic/msprog/onroad/optionnox/optional_low_nox_certified_hd_engines.pdf

107 Cal. Air Resources Board, A Guide to California's Clean Air Regulations for Heavy-Duty Diesel Vehicles (Feb. 2020), https://ww2.arb.ca.gov/sites/default/files/truckstop/pdfs/truck_bus_booklet.pdf.

116-2 U.S. EPA, Leak Detection and Repair: A Best Practices Guide (2014), https://www.epa.gov/sites/default/files/2014-02/documents/ldarguide.pdf

116-3 U.S. EPA, National Enforcement Investigations Center (NEIC): Field Science (last updated June 11, 2021), https://www.epa.gov/enforcement/national-enforcement-investigations-center-neic-field-science

119-1 Murray Slovick, *The Age of Zero-Emissions Heavy-Duty Trucks Begins,* Electronic Design (Feb. 12, 2021), https://www.electronicdesign.com/markets/automotive/article/21155025/electronic-design-the-age-of-zeroemissions-heavyduty-trucks-begins

119-2 *Biggest Zero-Emission Trucks Hit Market At Accelerating Rate, Boast Impressive Ranges,* Global Commercial Vehicle Drive To Zero (May 18, 2021), https://globaldrivetozero.org/2021/05/18/biggest-zero-emission-trucks-hit-market-at-accelerating-rate-boast-impressive-ranges-5-18-21/

119-3 Coalition for a Safe Environment, Zero Emission Transportation Vehicles, Cargo Handling Equipment, Construction Equipment & Ship/Boat Commercial Availability Survey (Jan. 20, 2022)

121-2 Babcock Wanson, Industrial Electric Boilers, https://www.babcock-wanson.com/product-category/industrial-electric-boilers/ (last visited Jan. 24, 2022)

121-2 R.F. MacDonald Co., Electric Boilers, https://www.rfmacdonald.com/products/boiler-types/electric/

122 New Jersey Dep't of Envtl. Protection, Proposed Rule N.J.A.C. 7:27F at 41, https://www.nj.gov/dep/rules/proposals/20211206a.pd

124 Cal. Air Resources Board and AltAir Paramount Settlement Agreement (Nov. 30, 2020), https://ww2.arb.ca.gov/sites/default/files/2020-12/altair_paramount_llc_sa_r.pdf

125 U.S. EPA, ECHO, Detailed Facility Report, Paramount Petroleum Refinery (Facility ID 110000475940), https://echo.epa.gov/detailed-facility-report?fid=110000475940.

127-1 John Cook, *Explosion at Imperium's Plant,* The Business Journals, Dec. 2, 2009, https://www.bizjournals.com/seattle/blog/techflash/2009/12/explosion_at_imperiums_plant.html

127-2 Veselina Petrova, *Green Plains Ethanol Plant Fire* , Renewables Now, Mar. 13, 2014, https://renewablesnow.com/news/green-plains-ethanol-plant-fire-caused-by-pump-failure-409393/

127-3 Veselina Petrova, *Biofuels Refinery in New Mexico Explodes*, Renewables Now, May 28, 2014, https://renewablesnow.com/news/rio-valley-biofuels-refinery-in-new-mexico-explodes-422745/

127-4 *Four Injured in Biofuels Plant*, HazardEx, Sept. 4, 2015, https://www.hazardexonthenet.net/article/105154/Four-injured-in-US-biofuels-plant-explosion-and-fire.aspx

127-5	Tsvetomira Tsanova, *New Fire Erupts at REG*, Renewables Now, Sept. 7, 2015, https://renewablesnow.com/news/new-fire-erupts-at-renewable-energy-groups-louisiana-biorefinery-491706/
127-6	OSHA, *OSHA Cites South Dakota Refinery,* Nov. 3, 2016, https://www.osha.gov/news/newsreleases/region8/11032016 (last visited Jan. 26, 2022).
127-7	UPM Biofuels, *Fire at UPM,* Oct. 5, 2021, https://www.upmbiofuels.com/whats-new/news/2021/05/fire-at-upm-lappeenranta-biorefinery/
129-2	Susan van Dyk et al., *Potential Synergies of Drop-In Biofuel Production with Further Co-processing at Oil Refineries*, 13 Biofuels Bioproducts & Biorefining, 760, 765 (Feb. 12, 2019) https://doi.org/10.1002/bbb.1974
129-3	Cal. Air Resources Board, PATHWAYS Biofuel Supply Module: Technical Documentation for Version 0.91 Beta (Jan. 2017), https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/bfsm_tech_doc.pdf.
129-3	U.S. Chemical Safety and Hazard Investigation Board, *Interim Investigation Report: Chevron Richmond Refinery Fire,* at 33–34 (Aug. 6, 2012), https://www.csb.gov/file.aspx?Documentid=5913
131-2	American Petroleum Institute, *Guidelines for Avoiding Sulfidation (Sulfidic) Corrosion Failures in Oil Refineries (* May 2009)
131-4; 133-5; 134-5; 135-2	Robinson and Dolbear, 2007. Commercial Hydrotreating and Hydrocracking. *In:* Hydroprocessing of heavy oils and residua. Ancheyta. J., and Speight, J., eds. CRC Press. Taylor & Francis Group: Boca Raton, FL. ISBN-13: 978-0-8493-7419-7.
135-3, 138, 139	Greg Karras, *Causal Analysis Reports for Significant Flaring;* Reports from two refineries during the period from 2010 through 2020 pursuant to BAAQMD Regulation 12-12-406. Bay Area Air Quality Management District (BAAQMD): San Francisco, CA.
136-2	Process Safety Integrity Report Refining Incidents: January 2018 Bayernoil Refinery Explosion, March 2017 Syncrude Fort McMurray Refinery Fire, January 2017 Sir Refinery Fire, January 2015 Petrobras (RLAM) Explosion, March 2005 BP Texas City Refinery Explosion, March 1999 Chevron Richmond Refinery Explosion, January 1997 Tosco Avon Hydrocracker Explosion, October 1992 Carson Refinery Explosion, April 1989 Chevron Refinery Fire,
144-1	PHMSA, Pipeline Incident 20 Year Trends, https://www.phmsa.dot.gov/data-and-statistics/pipeline/pipeline-incident-20-year-trends (click on "Significant Incident 20 Year Trend," then search System Type: Gas Transmission, State Name: California, and Onshore
144-2	George Avalos, *PG&E's Deadly Decade After San Bruno Explosion,* The Mercury News, Sept. 9, 2020, https://www.mercurynews.com/2020/09/09/san-bruno-pge-explosion-state-senator-plans-hearings/
144-3	Doha Madani, *At Least 1 Dead, 15 Injured in Gas Explosion at California Home*, NBC News, July 15, 2019, https://www.nbcnews.com/news/us-news/least-1-dead-15-injured-gas-explosion-california-home-n1030201.
158	SCAQMD, Table XI-A: Examples of Mitigation Measures of Fugitive Dust from Construction & Demolition (revised Apr. 2007), available for download at http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/fugitive-dust.
159-1	EPA, Next Generation Emission Measurement (NGEM) Research for Fugitive Air Pollution (last updated Oct. 12, 2021), https://www.epa.gov/air-research/next-generation-emission-measurement-ngem-research-fugitive-air-pollution
159-1	Specto-Technology, Real-time Dust Monitoring, Case Studies: SISK Group (Construction dust emissions), https://www.spectotechnology.com/product/real-time-dust-monitoring/
159-2	Justin Stewart, *How to Use Boundary Monitoring to Control Jobsite Hazards,* Construction Business Manager (Mar. 12, 2020), https://www.constructionbusinessowner.com/technology/how-use-boundary-monitoring-control-jobsite-hazards
163	Cal. Air Resources Board, Mandatory GHG Reporting – Reported Emissions, 2020 GHG Emissions Data, 2020 GHG Facility and Entity Emissions, available for download at https://ww2.arb.ca.gov/mrr-data
164	Searchinger, T. et al., Use of U.S. Croplands for Biofuels Increases Greenhouse Gases Through Emissions from Land Use Change. Science, 2008, 319, 1238, https://science.sciencemag.org/content/319/5867/1238

164-1 Pörtner, H.O.,et al., Scientific Outcome of the IPBES-IPCC Co-Sponsored Workshop on Biodiversity and Climate Change, IPBES Secretariat (June 2011) https://www.ipbes.net/events/ipbes-ipcc-co-sponsored-workshop-report-biodiversity-and-climate-change.

165 Globiom, The New Basis for EU Biofuel Policy 2021-2030 at 10-11, https://www.transportenvironment.org/wp-content/uploads/2021/07/2016%2004%20Globiom%20webinar.pdf.

166-1 J. Fargione et al., Land Clearing and the Biofuel Carbon Debt, 319 Science (Feb. 29, 2008), https://www.science.org/doi/10.1126/science.1152747

166-2 Hyungtae Kim et al., *Biofuels, Land Use Change, and Greenhouse Gas Emissions: Some Unexplored Variables*, 43 Environ. Sci. Technol. (2009) 43, 961-967, https://pubs.acs.org/doi/10.1021/es802681k.

166-3 Emily Cassidy, Envtl. Working Group, *Ethanol's Broken Promise: Using Less Corn Ethanol Reduces Greenhouse Gas Emissions* (May 2014), https://static.ewg.org/reports/2014/ethanol_broken_promise/pdf/ethanol_broken_promise_ewg_2014.pdf?_ga=2.119196234.2101745258.1535661702-1011223048.1532525647.

169 Rose Garr & Sheila Karpf, *Burned: Deception, Deforestation and America's Biodiesel Policy*, Mighty Earth and Action Aid (2018), https://www.actionaidusa.org/wp-content/uploads/2018/01/AAUSA_MightyEarth_Burned_FINAL_web.pdf

169 Chris Malins, Biofuel to the Fire: *The Impact Of Continued Expansion Of Palm And Soy Oil Demand Through Biofuel Policy*, Rainforest Foundation Norway (2020), https://d5i6is0eze552.cloudfront.net/documents/RF_report_biofuel_0320_eng_SP.pdf

173-1 SCAQMD, Greenhouse Gases (last visited Jan. 25, 2022), http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2

173-2 SCAQMD, Board Meeting Agenda No. 31 (Dec. 5, 2008), http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2

174-1 Intergovernmental Panel on Climate Change, *Climate Change 2021: The Physical Science Basis, Summary for Policymakers* (Oct. 2021), https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM_final.pdf

174-2 NASA, Global Temperature: Global Land-Ocean Temperature Index (last updated Jan. 13, 2022

175 Assembly Bill No. 398 (2017), https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB398

176 Cal. Air Resources Board, Cap-and-Trade Regulation Instructional Guidance, Chapter 1: How Does the Cap-and-Trade Program Work? at 12 (Sept. 2012), https://ww2.arb.ca.gov/sites/default/files/cap-and-trade/guidance/chapter1.pdf

177-1 Barbara Haya et al., *Managing Uncertainty in Carbon Offsets: Insights from California's Standardized Approach* (Stanford Law School ENRLP Program Working Paper, (2019), https://www-cdn.law.stanford.edu/wp-content/uploads/2015/03/Managing-Uncertainty-in-Carbon-Offsets-SLS-Working-Paper.pdf

177-2 Emily Benson & Catherine Puga, *All That Glitters Is Not Green*, Center for Strategic and International Studies (Sept. 2021), https://csis-website-prod.s3.amazonaws.com/s3fs-public/publication/210928_Benson_Glitters_NotGreen.pdf?oVqmNMptGHVWATNOTOq_VwKr0RY96SHD

177-3 Lisa Song & James Temple, *The Climate Solution Actually Adding Millions of Tons of CO2 Into the Atmosphere*, ProPublica (Apr. 29, 2021), https://www.propublica.org/article/the-climate-solution-actually-adding-millions-of-tons-of-co2-into-the-atmosphere.

179-1 Center for Climate and Energy Solutions, *California Cap and Trade*, https://www.c2es.org/content/california-cap-and-trade/#:~:text=Starting%20in%202015%2C%20the%20program,percent%20from%202021%20through%202030 (last visited Jan. 25, 2022)

179-2 Jason Ye, Center for Climate and Energy Solutions, *Summary of California's Extension of Its Cap-and-Trade Program* (Aug. 2017), https://www.c2es.org/wp-content/uploads/2017/09/summary-californias-extension-its-cap-trade-program.pdf.

194 Chevron Refinery Modernization Project RDEIR, SCH# 2011062042, https://ceqanet.opr.ca.gov/Project/2011062042

Pollin, R. et al., *A Program for Economic Recovery and Clean Energy Transition in California*, Political Economy Research Institute (2021), https://peri.umass.edu/publication/item/1466-a-program-for-economic-recovery-and-clean-energy-transition-in-california

Xee Moua, California Alternative Energy and Advanced Transportation Financing Authority,*Request to Approve Project for Sales and Use Tax Exclusion for Alt-Air Paramount, LLC* , Application No. 20-SM004, at 5 (Jan. 21, 2020) https://www.treasurer.ca.gov/caeatfa/meeting/2020/20200121/staff/4a3.pdf.

Steve Hymon, *Metro Board Approves Route for Initial Segment for West Santa Ana Branch Project and Unior Station as Northern Terminus,* Metro: The Source (Jan. 28, 2022), https://thesource.metro.net/2022/01/28/metro-board-approves-route-for-initial-segment-for-west-santa-ana-branch-project-and-union-station-as-northern-terminus/

AltAir Renewable Fuels Conversion Project Draft SEIR, SCH Number 2020069013, https://ceqanet.opr.ca.gov/Project/2020069013

February 3, 2022

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,
We are submitting this letter in regards to the proposed expansion of AltAir/World Energy. As I appreciate World Energy's safety record operating the facility, the commitment of AltAir/World Energy to produce Renewable Fuels, and the growth of our local economy by bringing local high-paying jobs, along with its efforts to reach out to the community, there are still some concerns in which we believe the Cities of Paramount, Bellflower and AltAir/World Energy could address.

We have been Paramount residents for over 25 years and currently live across the street in the Somerset homes tract for the last 20 years. It's a beautiful tract of 150 homes that includes families, young professionals and older residents. We both are active at our church in Paramount and have participated in several community clean-ups and most recently, food distribution sites during the pandemic. We are committed to helping the City of Paramount be the best that it can be and can see all the improvements that have been made over the years.

With regards to the proposed expansions of the facility on Somerset, our concern is the intersection at Lakewood Blvd. and Somerset Blvd, specifically when you driving on Somerset approaching Lakewood Blvd. The intersection is dangerous since there is no left hand turn signal (traveling east/west). We have been told there has been numerous accidents (over 15 in the last several years) at the intersection but no action has been taken to add the turn signal. It is our understanding that the City of Bellflower now owns this intersection and with the expansion & the addition of the Metro in that same area, our concern is more trucks will make this intersection a traffic nightmare. Was there a Traffic Survey done taking all this in to consideration? What type of traffic control will be implemented during all this expansion & construction? Our neighborhood would appreciate the City of Paramount getting involved with City of Bellflower to work together on this issue. Please do everything you can to encourage the use of pipeline and rails, rather than trucks in this new expansion. Keep in mind, our residents would be greatly impacted by any disruption of traffic flows, as there is only one entrance/exit to the tract. We have no other alternative to enter/exit except off of Somerset directly across street from the AltAir/World Energy Truck Entrance. DJH-1

We would also like to recommend HEPA Filters be provided for the houses surrounding AltAir/World Energy during construction. We occasionally see black soot and grime on our houses, cars and windows currently and anticipate there will be more during construction/expansion. Our neighbors would appreciate this extra safety measure to the air in our homes. DJH-2

As residents living in close proximity to the AltAir/World Energy facility, we appreciate the opportunity to provide public comment in writing. Several neighbors have worked hard over the last several years to demand that then metal companies in Paramount clean up their procedures in order to have cleaner air in Paramount. We are expecting a continuance of the same quality of service from AltAir/ World Energy & the City of Paramount. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Dan & Joanne Hare
15120 Rancho Centina Road

The objectives of this project are disproportionately focused on cost cutting measures and production oriented improvements that either mostly benefit World Energy or speak to larger societal benefits that do not clearly and directly benefit those most harmed by this facility. Those most harmed include both neighboring residents and the community at large. We have an opportunity to hold this facility accountable to the community in which it has long operated. Though ownership has changed in recent years, harm on local residents continues, even if it is being mitigated. Mitigation is not an objective that "benefits" those of us who live here, it is simply a lesser harm. While mitigation is better than the supposed baseline comparisons, determining how mitigation is being defined and framed is knowledge that should be co-produced with those who are most harmed. Since dangerous exposures on local residents remain, residents should be featured more prominently in the project's objectives. We need this project to be more "people centered". While it is great that this project will reduce dependency on fossil fuels, this is not necessarily a direct benefit to the residents of Paramount. Such goals are great in a global and national context, but not particularly for the residents of Paramount who face serious health risks and costs. More aggressive efforts should be pursued to protect and empower this community. A proper community engagement and participatory process needs to happen in order to reach more adequate and people-centered objectives. We need to focus on reaching some sort of Community Benefits Agreement.

JL-1

Jaime Lopez

LOS ANGELES COUNTY
SANITATION DISTRICTS
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

January 19, 2022

Ref. DOC 6400104

Mr. John Carver, Director of Planning
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

Dear Mr. Carver:

NOC Response to AltAir Renewable Fuels Conversion Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Completion (NOC) of a Draft Subsequent Environmental Impact Report (DSEIR) for the subject project on December 9, 2021. The proposed project is located within the jurisdictional boundaries of District No. 2. Previous comments submitted by the Districts to your agency in correspondence dated July 15, 2020 (copy enclosed) still apply to the subject project with the following comments:

1. **Section 2.5.2 Project Pipelines**, page 2-26: the fourth paragraph stated that "The existing reclaimed water system that services the Paramount Refinery for landscaping irrigation would be modified to add an additional connection to allow the Project to utilize reclaimed water for process water needs." Please note that recycled water is not currently being delivered for any use at this facility, but it is provided for street median landscaping at the Downey Avenue and Contreras Street intersection. LACSD-1

2. **Section 2.6.1 Project Construction Activities**, page 2-31: the sixth paragraph stated that "During construction activities, water would be applied as a dust suppressant to the construction areas during grading, trenching, and earth-moving activities…." Please clarify whether these construction activities are to be supplied with recycled water. LACSD-2

3. **Section 4.10.1.1 Wastewater**, page 4.10-1: the third paragraph under this section stated that "The LACSD reports nearly 4,245 million gallons per year (130,000 acre-feet per year [AFY]) of wastewater was treated to recycled water quality in 2013-2014 at the JOS." Please note that the more recent flows from 2020 to 2021 are 35,157 million gallons per year (108,000 AFY). LACSD-3

4. **Section 4.10.4.2 Project Water Supply and Demand**, page 4.10-14: the last paragraph stated that "The Los Coyotes WRP produces approximately 6,000 AFY or 5.3 mgd, which is sufficient to meet the potential increase in water associated with the Project of approximately 2.0 mgd." Please note that the numbers quoted are quantities of recycled water produced by the Los Coyotes WRP that were put to beneficial reuse. LACSD-4

5. Please clarify whether recycled water demand for the facility will be continuous, and, if so, if on-site recycled water storage will be available. LACSD-5

6. The proposed project may impact existing and/or proposed Districts' facilities (e.g. trunk sewers, recycled waterlines, etc.) over which it will be constructed. Districts' facilities are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specification that incorporate Districts' LACSD-6

facilities are submitted for our review. To obtain copies of as-built drawings of the Districts' facilities within the project limits, please contact the Districts' Engineering Counter at engineeringcounter@lacsd.org or (562) 908-4288, extension 1205. When project plans incorporating our facilities have been prepared, please submit copies to the Engineering Counter for our review and comment. LACSD-6 continued

7. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Downey Avenue Trunk Sewer, located in Downey Avenue at Somerset Boulevard. The Districts' 15-inch diameter trunk sewer has a capacity of 2.0 million gallons per day (mgd) and conveyed a peak flow of 1.3 mgd when last measured in 2015. LACSD-7

8. The expected average wastewater flow from the project site, which is a 25,000 barrels per day renewable fuels production facility, is 845,280 gallons per day as listed in table 4.10.10 of the DSEIR. LACSD-8

9. Due to the anticipated volume of wastewater to be generated by the proposed project and other planned developments in the area, the proposed project may have significant impacts on the Districts' sewerage system. Although there is no relief sewer scheduled for construction at this time, as additional flows are generated and the Districts' trunk sewer nears capacity, construction of a relief sewer will be scheduled, depending on the availability of relief project funding. Therefore, the availability of trunk sewer capacity should be verified as the project advances. LACSD-9

10. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 249.8 mgd. LACSD-10

11. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727. If an Industrial Wastewater Discharge Permit is required, connection fee charges will be determined by the Industrial Waste Section. LACSD-11

12. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities. LACSD-12

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsd.org.

Very truly yours,

Mandy Huffman

Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh

Enclosure

cc: E. Bensch
J. Chung
A. Howard
R. Paracuelles
A. Schmidt
Engineering Counter

LOS ANGELES COUNTY
SANITATION DISTRICTS
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

July 15, 2020

Ref. DOC 5759221

Mr. John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

Dear Mr. Carver:

NOP Response for Paramount Petroleum AltAir Renewable Fuels Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on June 15, 2020. The proposed project is located within the jurisdictional boundary of District No. 2. We offer the following comment:

- The proposed project may require an amendment to a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section in order to reach a determination on this matter. If this update is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacsd.org.

Very truly yours,

Adriana Raza

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: J. Kilgore

February 3, 2022

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,
I am submitting this letter in regards to the proposed expansion of AltAir/World Energy. As I appreciate World Energy's safety record operating the facility, the commitment of AltAir/World Energy to produce Renewable Fuels, and the growth of our local economy by bringing local high-paying jobs, and its efforts to reach out to the community, ***I also have some concerns*** in which I believe the Cities of Paramount, Bellflower and AltAir/World Energy could address.

I am a Paramount resident and live across the street in the Somerset homes tract, as well as other members of my family who also live in this tract of 150 homes. Our family has lived in Paramount almost 100 years, and has contributed a great deal to Paramount in those years.

My major concern is the Lakewood Blvd./Somerset Blvd intersection. First of all, that intersection is very deadly. I went in front of city council about 3 years ago regarding getting left hand turn signals added. At that time I was told there had been 18 accidents at that intersection in 2 years, and I have personally witnessed 3 more since. I understand the City of Bellflower now owns this intersection, and there are still NO left had turn signals (East/West). I am concerned with the expansion & the addition of the Metro, more trucks will make this intersection a traffic nightmare! Was there a Traffic Survey done taking all this in to consideration? What type of traffic control will be implemented during all this expansion & construction? Our neighborhood would appreciate the City of Paramount getting involved with City of Bellflower to work conjointly on this issue. Please do everything in your power to encourage use of pipeline and rails, rather than trucks in this new expansion. Keep in mind, our tract would be greatly impacted by any disruption of traffic flows, as there is only 1 entrance/exit to our tract. We have no other alternative to enter/exit except off of Somerset directly across street from the AltAir/World Energy Truck Entrance. M&C-1

I would also like to see HEPA Filters provided for the houses surrounding AltAir/World Energy during construction. I see the black soot and grime on my newly painted house, and I imagine there will be more during construction / expansion. My neighbors & family would like an extra safety measure to the air in our homes. M&C-2

Lastly, we would like to see a beautification of the AltAir/World Energy truck entrance on the corner of Lakewood Blvd & Somerset. They did a nice job on Somerset surrounding the refinery, however they neglected the truck entrance, and it does not keep in theme with the beautiful aesthetics of Paramount. M&C-3

I appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. We have worked very hard to demand that 7 metal companies in the City, clean up their procedures, in order for cleaner air in Paramount in the past 6 years. We are expecting a continuance of the same quality of service from AltAir/ World Energy & the City of Paramount. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,
Mike & Cindy Guillen Nelson
15133 Rancho Centina Rd.
(Neighborhood Watch Captain)
(Members of Paramount Community Coalition Against Toxins)

Paramount Unified School District

15110 California Avenue, Paramount, California 90723-4378
(562) 602-6000 Fax (562) 602-8111

February 3, 2022

Mr. John Moreno, City Manager
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

RE: Paramount Unified School District – Response to the Draft Subsequent Environmental Impact Report (EIR) for Renewable Fuels Project (World Energy / AltAir).

Dear Mr. Moreno,

We would like to thank you for facilitating the conversation regarding the proposed World Energy/Alt Air energy project and for providing the EIR and presentation. Below please find the district's response which includes areas of concern and remedies.

Background:
The Paramount USD has multiple school locations and a central office near or adjacent to the project area. This document serves as a response to the Environmental Impact Report (EIR), with detailed information about the district's areas of interest relating to the project and the impacts, as articulated in the report, to district schools in the vicinity of the project.

EIR identified impacts to Paramount USD and responses requested:
The impacts are listed with numbering and labels articulated in the body of the document:

Traffic – Rail - T-1: Rail car deliveries and pick-ups will be limited to the non-peak hour traffic periods, after 10:00 a.m. and before 6:00 p.m. The refinery operators and management will continue to work with the railroad so that train traffic to and from the refinery does not coincide with the morning and evening commute times or when students are going to or leaving school. No deliveries during the evening, night, and early morning periods will be permitted unless prior notification to the City is provided.

PUSD-1

PUSD Impact #1A: Need for revision to rail car deliveries schedule: Request update in the current published schedule to address school egress time, which falls within the proposed operational hours of 10:00 a.m. to 6:00 p.m., and review current notification process, which does not require approval by the City. Failure to revise the rail car deliveries schedule will result in dangerous traffic conditions during school egress time, which currently is at 2:00 p.m. (varies slightly by grade) for Wirtz Elementary (directly adjacent to the project site), and 3:15 p.m. for Paramount High School (across the street from the project site).

Traffic – Trucks – 4.8-21 - The Project would generate heavy truck and rail trips in an area with a variety of land uses, including schools. Truck and rail activities have the potential to conflict with students walking to school as well as create additional congestion, cueing on area streets (backing up of trucks), and potential hazardous turning situations for trucks exiting/entering the refinery along Lakewood Blvd. or Somerset Blvd. Both truck and rail traffic is anticipated to increase with the Project.

PUSD Impact #1B: Need for revision to rail car deliveries schedule: Same concern as with prior item, need to mitigate impact during school ingress and egress – Update operational hours to mitigate school-related traffic impact.

PUSD-2

4.8-23 Indicates similar issues and therefore concerns for the school district - This item would be a potentially significant impact. This issue was addressed in 4.8 TRANSPORTATION AND CIRCULATION Draft SEIR 4.8-24 AltAir Renewable Fuels Conversion Project December 2021 the 2013 MND with mitigation measures similar to those discussed above. As part of CUP 751 (City of Paramount, 2013a) and CUP 757, these mitigation measures were imposed to minimize rail conflicts and delays at the Downey Avenue rail crossing.

PUSD Impact #1C: The school district requests verification that the listed measures in 4.8-23 would apply to the Project. **The extent to which the 2013 MND mitigation measures would be considered sufficient to mitigate the significant impact is not known with the additional train deliveries. In the absence of monitoring and surveys, this could be a potentially significant impact**.

PUSD-3

Noise – 4.6-8 - The State Office of Noise Control has prepared Guidelines for the Preparation and Content of Noise Elements of General Plans. These guidelines serve as a guide for the compatibility of noise-sensitive land uses. Residential uses should not be located in areas exceeding 70 dB CNEL. **Schools, libraries, hospitals, and nursing homes are treated as noise-sensitive land uses, requiring mitigation when such development occurs in areas where the ambient noise levels exceed 60 dB CNEL.**

PUSD Impact #2A: Request assurances and detailed information about how the noise levels will comply with school noise-sensitive land use standards.

PUSD-4

4.6-18 Indicates mitigation measures = Mitigation measure MM-N-2a requires the Applicant to provide a detailed noise assessment and also provides for additional noise barriers and/or other equipment to lower the noise from operation of the Project at the refinery.

PUSD Impact #2B: Request detailed information on mitigation measures and implementation timeline.

PUSD-5

4.7-15 Indicates noise levels for residential but does not appear to include schools.

PUSD Impact #2C: Request detailed information on noise level information directly related to the project and specific to schools.

PUSD-6

HM.3 – Natural Gas Pipeline - Under impact HM.3, the installation of a large natural gas pipeline 3.7 miles in length through heavily populated areas would introduce an additional hazard to the area and would be a significant and unavoidable Class I impact. Hazards associated with marine barge spills to the environment would also
be a significant and unavoidable Class I impact.

PUSD Impact #3A: Request additional detail regarding the potential impacts and any mitigation measures proposed to be implemented relating to any new and retrofitted gas lines for the project.

PUSD Impact #3B: **Provide the results of the School Site Pipeline Risk Analysis based on the California Department of Education Criteria (Title 5, California Code of Regulations, Division 1, Chapter 13).**

PUSD-7

HM.4 – Air Quality / Scenarios - The Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Phase=Operation. Mitigation Measures=None required. 4.4-42 = The

PUSD-8

existing refinery operations could impact the schools through a BLEVE scenario associated with the large LPG storage vessels located at the refinery. LPG materials are produced and stored both under the baseline historical operations and the Project operations. As can be seen under the discussion for Impact HM.2, the hazard zones associated with the Project would be slightly smaller than the baseline refinery operations, **yet impact zones would continue to reach the schools at the same level as the baseline historical operations**. Therefore, impacts would be the same as the baseline and would be less than significant (Class III).

PUSD Impact #4A: Request detail on measures implemented to reduce the potential of a BLEVE scenario that can impact the schools in the district, including alternatives available to protect the schools near the project area from the scenario possibilities.

PUSD-8 continued

Paramount USD requested mitigation measures:

Based on the information contained in the report, the Paramount USD requests the following mitigation measures:

1. Air quality monitors in the schools near the refinery – This will serve to monitor air quality in and around the schools near the project area, and provide information, as well as mitigation measures, should the air quality decay due to the emissions from the refinery. The school district will work with AltAir/World Energy to develop an agreement for the installation of the monitoring equipment in district facilities.

PUSD-9

2. Filters for schools – The district has implemented a substantial air filtering system in all schools to assist with the improvement of indoor air quality in classrooms and offices, including Merv 16 filtration and HEPA filters. The provision of filters for the district units in schools and offices near the refinery will assist the district in maintaining the school space air quality and reduce odors emanating from the refinery. Note: The engineering team in charge of the EIR report indicated that filters will be provided as part of the mitigation process, during the Board meeting presentation and Q&A on the project on January 12, 2022, by Mr. Greg Chittick and Luis Perez from MRS Environmental Inc. For this item, a Board of Education member indicated the "need for Carbon filters for the gasses and HEPA filters for particulate matter that will be provided in perpetuity for Paramount High School and Wirtz Elementary School."

PUSD-10

3. Additional Mitigation Measures – The school district requests details on additional mitigation measures proposed in the report, with implementation timelines and a detailed explanation and rationale for measures not implemented. Of primary importance to the district are mitigation measures relating to gas lines and the potential scenarios described in HM.4.

PUSD-11

The Paramount Unified School District wishes to thank the environmental impact report team, the facilitation of a meeting with City staff and consultants to receive EIR information, and the inclusion of the consultants from MRS Environmental, Inc. during the School Board meeting where the EIR was discussed. The school district considers the safety of students and staff of primary importance for the success of the schools' programs, and the potential impacts detailed on the EIR are cause for concern if not addressed thoroughly. As such, we expect a comprehensive response to the items listed and consideration for any other items related to the proposed project that can impact the air quality, safety, and positive conditions of our instructional programs.

Thank you for your attention.

Ruben Frutos
Superintendent

Cc: Board of Education
Mr. John Carver, Director-Planning

SCAG
INNOVATING FOR A BETTER TOMORROW

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

February 7, 2022

Mr. John Carver, Director of Planning
City of Paramount
16400 Colorado Avenue
Paramount, California 90723
Phone: (562) 220-2048
E-mail: JCarver@paramountcity.com

RE: SCAG Comments on the Draft Subsequent Environmental Impact Report (SEIR) for the AltAir Renewable Fuels Conversion Project [SCAG NO. IGR10561]

Dear Mr. Carver,

Southern California Association of Governments (SCAG) reviewed the Draft Subsequent Environmental Impact Report (SEIR) for the AltAir Renewable Fuels Conversion Project ("proposed project"). The proposed project includes the conversion of a crude oil refinery into a renewable fuels production facility and would include a new Pretreat Unit, modifications to existing Renewable Fuels Units, new Hydrogen Generation and Recovery units, new Propane and Hydrogen Sulfide Recovery units, a second Sour Water Stripper, a new flare, modifications to truck and rail loading racks, and new pipelines on a 66-acre site.

Based on SCAG staff's review, the proposed project generally supports overall the goals of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). SCAG staff comments are detailed in the attachment to this letter.

When available, please send the Final Subsequent Environmental Impact Report to IGR@scag.ca.gov. If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

COMMENTS ON THE NOTICE OF AVAILABILITY OF A DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR ALTAIR RENEWABLE FUELS CONVERSION PROJECT [SCAG NO. IGR10561]

SUMMARY

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies.

Based on SCAG staff review, the SEIR does not reference the most recently adopted 2020 Connect SoCal. SCAG staff recommends including references to Connect SoCal as described in the following sections.

CONNECT SOCAL GOALS

The SCAG Regional Council fully adopted Connect SoCal in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCAL GOALS	
Goal #1:	*Encourage regional economic prosperity and global competitiveness*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*
Goal #3:	*Enhance the preservation, security, and resilience of the regional transportation system*
Goal #4:	*Increase person and goods movement and travel choices within the transportation system*
Goal #5:	*Reduce greenhouse gas emissions and improve air quality*
Goal #6:	*Support healthy and equitable communities*
Goal #7:	*Adapt to a changing climate and support an integrated regional development pattern and transportation network*
Goal #8:	*Leverage new transportation technologies and data-driven solutions that result in more efficient travel*
Goal #9:	*Encourage development of diverse housing types in areas that are supported by multiple transportation options*
Goal #10:	*Promote conservation of natural and agricultural lands and restoration of habitats*

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. To view Connect SoCal and the accompanying technical reports, please visit the Connect SoCal webpage. Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

SCAG Staff Comments

Page 4.3-13 of the SEIR references the Santa Barbara County Association of Governments Regional Transportation Plan and Sustainable Communities Strategy. Since this project is in the SCAG region, SCAG staff recommends including a reference to 2020 Connect SoCal and consideration of its adopted goals and policies when finalizing the proposed project. SCAG-1

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the Connect SoCal Demographics and Growth Forecast Technical Report. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted City of Paramount Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	56,146	56,673	56,956	57,534
Households	6,333,458	6,902,821	7,170,110	7,633,451	14,179	14,311	14,382	14,529
Employment	8,695,427	9,303,627	9,566,384	10,048,822	21,722	22,133	22,341	23,000

SCAG Staff Comments

SCAG staff recommends including a reference to the population, housing, and employment trends and forecasts based on the most recently adopted SCAG 2020 Connect SoCal Regional Growth Forecasts to recognize the city's planned growth. SCAG-2

MITIGATION

SCAG Staff Comments

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG's Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the PEIR webpage and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories. SCAG-3

Agustin Exiga
Gus's Deli BBQ And Grill
8320 Alondra Blvd.
Paramount, CA 90723
562-630-2802

January 30, 2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

As a prior resident of Paramount and continued Business Owner in Paramount, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. I believe the city has conducted a thorough environmental review under CEQA to analyze the benefits and potential impacts of the project for our community.

I arrived in Paramount in 1975 and have lived and conducted Business in Paramount ever since then. In 1999 I started my business in Paramount. The City of Paramount has been there for me and have supported me with many adventures throughout the years.

AE-1

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. World Energy is converting a former asphalt crude oil refinery into a 100% renewable fuels production facility, one of the cleanest fuel refineries in the world. I recognize the need for the low carbon fuels produced by World Energy at its Paramount facility to address both climate change and local air pollution. I am proud to have these cleaner renewable fuels, such as Sustainable Aviation Fuel, be developed in Paramount.

I appreciate World Energy's safety record and their operating of the facility. I support the AltAir/World Energy Renewable Fuels Conversion Project as it will continue to support our community with employment for many people who live in and around the area. We know this project is cleaner for Paramount and will continue to lower the risk of cancer in our community.

I appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the city. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely, Agustin Exiga

Agustin Exiga(Gus)

Air Products and Chemicals, Inc.
4000 MacArthur Boulevard, Suite 420 East Tower
Newport Beach, CA 92660-2545
T 949-474-1860, F 949-474-1830
www.airproducts.com

December 29, 2021

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of Air Products, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

Air Products is the only U.S.-based global industrial gas company, in operation for over 80 years and with operations in more than 50 countries around the globe. Worldwide, Air Products is the largest hydrogen producer with over 1,800 miles of industrial gas pipelines. Within California, the company safely operates 9 hydrogen production facilities, 35 miles of hydrogen pipeline and currently supplies ~80% of the hydrogen currently used in the California mobility market.

World Energy uses Air Products hydrogen to produce renewable fuels that will be produced by this project. As a leader in the development of renewable fuels, including sustainable aviation fuel, World Energy's products will serve as crucial components to the state's decarbonization strategy. World Energy processes renewable feedstock to produce clean energy.

APCI-1

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. The fuel produced by World Energy's facility has less impact on public health than prior operations. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels from renewable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

Air Products believes the City has conducted a thorough environmental review under CEQA to analyze the benefits and potential impacts of the project. We appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

J.P. Gunn
Hydrogen (HyCO) Business Manager, California

December 22, 2021

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Priority for Local Air Quality Improvement via Initiatives including AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

American Cancer Society would like to affirm that, as a region with some of the worst air quality in our country influencing our disproportionately higher levels of local chronic disease impact in communities like Paramount, we recognize the importance of implementation of the AltAir/World Energy Renewable Fuels Conversion Project. This Project will enable emission reduction and improved transportation. As a volunteer-led charity executing on our mission, we have several constituents and communities we continue to serve in Paramount and neighboring areas.

Our 2035 Vision asserts the need to decrease mortality rates from cancer by 40%. Immediate efforts to decrease carcinogenic risk factors and to improve health equity remain our top priorities. The American Cancer Society editorial and medical content team reports that several national and international agencies study substances in the environment to determine if they can cause cancer. The American Cancer Society looks to these organizations to evaluate the risks based on evidence from laboratory, animal, and human research studies. A substance that causes cancer or helps cancer grow is called a carcinogen. Many of these expert agencies have classified diesel exhaust as carcinogenic, based largely on the possible link to lung cancer. The International Agency for Research on Cancer (IARC) is part of the World Health Organization (WHO). Its major goal is to identify causes of cancer. IARC classifies diesel engine exhaust as "carcinogenic to humans," based on sufficient evidence that it is linked to an increased risk of lung cancer. IARC also notes that there is "some evidence of a positive association" between diesel exhaust and bladder cancer. The National Toxicology Program (NTP) is formed from parts of several different US government agencies, including the National Institutes of Health (NIH), the Centers for Disease Control and Prevention (CDC), and the Food and Drug Administration (FDA). The NTP has classified exposure to diesel exhaust particulates as "reasonably anticipated to be a human carcinogen," based on limited evidence from studies in humans (mainly linking it to lung cancer) and supporting evidence from lab studies. The US Environmental Protection Agency (EPA) maintains the Integrated Risk Information System (IRIS), an electronic database that contains information on human health effects from exposure to various substances in the environment. The EPA classifies diesel exhaust as "likely to be carcinogenic to humans." The National Institute for Occupational Safety and Health (NIOSH) is part of the CDC that studies exposures in the workplace. NIOSH has determined that diesel exhaust is a "potential occupational carcinogen." (further information available via www.cancer.org). World Energy's low carbon fuels reduce harmful diesel exhaust.

ACS-1

We appreciate the opportunity to provide public comment in writing organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project. World Energy's low carbon fuels address mortality risk, mitigating carcinogenic triggers to cancer and ultimately fighting together to defeat cancer. Since 1913, American Cancer Society continues the fight against cancers of all types, with more than 2 million people actively involved in communities across the country.

Our sincerest thanks,

Dan Witzling

Dan Witzling
Senior Executive Director, American Cancer Society
5731 W Slauson Ave Suite 200
Culver City, CA 90230

January 14, 2022

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

Breathe Southern California (Breathe SoCal) and the Healthy Air Alliance support efforts being made to reduce emissions in Southern California, especially diesel emissions. As such, we support the AltAir/World Energy Renewable Fuels Conversion Project that will lead to emissions reductions from diesel in vulnerable communities and increase the availability of hydrogen, which will help our state meet its climate goals.

Breathe SoCal is a nonprofit organization that promotes clean air and healthy lungs through research, education, advocacy, and technology. For over 50 years, we have been a leader in air quality improvement efforts in California. In October 2019, we launched our End Diesel Now campaign, which seeks to eliminate diesel pollution from the goods movement sector.

The Healthy Air Alliance believes every person has the right to breathe clean air. We are committed to stopping another generation from exposure to dangerous toxins from fossil fuels. Transportation is the largest source of these emissions in California. That is why we remain focused on replacing fossil fuels with cleaner fuel alternatives as an equitable strategy to make a difference now in community health across California.

BSC-1

Projects such as the AltAir/World Energy Renewable Fuls Conversion Project are ways we can effectively reduce air pollution. A discussion of actionable solutions based on science must include cleaner fuel choices that will immediately lower harmful emissions, improve health in our most vulnerable communities, and make cleaner and more affordable transportation solutions available to all.

The negative health impacts of diesel particulate matter are staggering, and diesel exhaust contributes to Southern California's nation-worst air quality. To meet the state's ambitious goals combating climate change, cleaner fuels must play a role in achieving those standards. Additionally, it is imperative that World Energy take further action to decrease emissions in the region, including utilizing clean trucks and clean locomotives whenever and wherever feasible.

Projects such as this that reduce diesel emissions, and thus the adverse health impacts associated with inhaling diesel particle pollution, support California's vital leadership in prioritizing public health and fighting air pollution. Should you have any questions regarding this letter, please contact me at (323) 935-8050 x250 or at MCarrel@breathesocal.org. Thank you for your consideration.

Sincerely,

Marc Carrel
President & CEO
Breathe Southern California

Jim Kennedy
Executive Director
Healthy Air Alliance

January 17, 2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of California Advanced Biofuels Alliance (CABA), I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. CABA is a not-for-profit trade association promoting the increased use and production of advanced biofuels in California. CABA has represented biomass-based diesel (BMBD) feedstock suppliers, producers, distributors, retailers and fleets on state and federal legislative and regulatory issues since 2006. Our mission is to promote the production and use of advanced biofuels in California.

Biomass-based diesel is derived from food by-products, like animal fats and used cooking oil. In fact, BMBD brings a second use to these otherwise waste products. Utilization of biomass and bio-waste supports farmers' and restaurants' livelihood and improves their sustainability practices. Additionally, World Energy will take excess oil byproduct from the soy protein industry to produce cleaner fuels necessary to achieve California's carbon-neutral objectives in the hard-to-electrify sectors like heavy-duty transportation and aviation.

CABA-1

California has set the national standard in developing ambitious climate targets and air quality standards. Given that the transportation sector is responsible for approximately 40% of the state's greenhouse gas emissions, developing low-carbon solutions for commercial motor vehicles and aviation will be an important part of emissions reduction plans. Furthermore, because vehicles powered by gasoline, diesel, and other conventional fuels produce nearly 80% of smog-forming emissions within the state, deploying cleaner-burning fuels are critical to addressing the state's environmental health priorities.

For example, BMBD has played a key role in the Low Carbon Fuels Standard (LCFS), providing nearly half (45%) of the LCFS carbon reductions over the last three years and 42% overall since 2014. These sustainable diesel replacements have grown from a mere 14 million gallons in 2011 to nearly 900 million gallons in 2020. Nearly a quarter of the diesel fuel pool now comprises biomass-based diesel.

As a leader in the development of these low-carbon and renewable fuels, including sustainable aviation fuel, World Energy's products will serve as crucial components to the state's decarbonization strategy.

World Energy processes renewable feedstock to produce clean energy. We believe the City has conducted a thorough environmental review under CEQA to analyze the benefits and potential impacts of the project.

The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels from renewable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

CABA-1 continued

We appreciate the opportunity to provide public comment in writing. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Rebecca Baskins
Executive Director
California Advanced Biofuels Alliance

CAMPORA propane

1/20/22

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of Campora Propane, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

Propane is often our fleet's fuel of choice for its power, proven duty-cycle capabilities, and unlike conventional fuels, it will not degrade when stored even for decades. Innovation is driving advancements in the propane industry, including renewable propane as well as new ultra-low NOx (near-zero) engine technologies. Today's propane provides clean power for fleets that daily serve thousands of commercial, industrial, and agricultural enterprises across the state. The advent of renewable propane, derived from sustainable sources such as used cooking oil and beef tallow, now further increases the propane industry's value proposition. The California Air Resources Board (CARB) released a pathway in 2019 showing that renewable propane has a carbon footprint on par with, or in some cases even lower than that of electricity. Both traditional and renewable propane can also be blended with renewable Dimethyl Ether (DME), derived from methane capture, reducing emissions further, and depending on feedstocks may even have a negative carbon intensity value. Most importantly, the fact that renewable propane is fungible with conventional propane means our company can rapidly deploy a clean energy solution without costly infrastructure upgrades and delays to deployment. Renewable propane can be delivered and utilized right now, providing clean air benefits immediately.

CP-1

As a leader in the development of low-carbon and renewable fuels, World Energy's products will serve as crucial components to the state's decarbonization strategy. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels, such as renewable propane, from sustainable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

Campora Propane appreciates the opportunity to provide input and support the planned Conversion Project. We hope the City of Paramount will realize the emission reductions that this essential clean energy project will provide not only to residents of Paramount, but to all Californians.

Sincerely,

Mark Price
Campora Propane

Chemco Products Company
6401 E. Alondra Blvd. Paramount, CA 90723-3758
Phone: 866-243-6261 Fax: 562-602-2811 www.chemcoprod.com

January 28, 2022

Mr. John Carver
Planning Director
CITY OF PARAMOUNT
16400 Colorado Avenue
Paramount, CA 90723

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver:

Chemco Products Company has been headquartered in Paramount, California for over 30 years. We fully support AltAir/World Energy Renewable Fuels Conversion Project. They are a long-term customer of ours and we also supply them with eco-friendly products. As a member of the Paramount community, Chemco appreciate the efforts put forth to address the global impact of climate issues, as well as the local air quality. Renewable fuels are necessary for our future well- being and we are proud to be associated with AltAir/World Energy in this endeavor. Also, the employment opportunities brought to Paramount cannot be overstated.

Chemco's purpose statement is "leading the world to a cleaner, safer place through unparalleled customer service, one client at a time." Chemco also prides itself on partnering with our customers to create a safer, healthier environment by minimizing energy consumption and reducing waste. Our efficient, sustainable practices combine innovative technology, education and training, and accurately applied chemistry. Leadership happens by example. Every day we focus on helping our clients provide superior quality food and beverages. As global citizens, our role is to pioneer eco-friendly systems and products. We seek to lead the industry in sustainability and productivity by delivering dynamic, customized solutions to your business needs.

This project will absolutely invigorate the city of Paramount and its residents, as well as set a national example for other cities to follow. We appreciate the opportunity to be able to lend our support to this great city, as well as our esteemed customer, AltAir/World Energy.

CPC-1

CHEMCO PRODUCTS COMPANY

Jamie Utz Thomas

Jamie Utz Thomas
CEO

/ju

CHERNE CONTRACTING CORPORATION

Performance
Driven
Construction

January 26, 2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

Cherne is pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. We are confident the City has thoroughly analyzed the benefits and potential impacts of the project under the strict guidelines of the CEQA.

Cherne has performed work in the Paramount and LA Basin area for over 45 years. Cherne, a union only, heavy industrial contractor, whose heritage is that of a general contractor, we employ up to 1,500 people depending on the projects and prioritize local hire in the Paramount area. Cherne is proud to support the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft SEIR and CUP. We congratulate World Energy for providing the energy sources of the future! We fully support this project and believe the Draft SEIR accurately represents this positive and environmentally responsible project.

CCC-1

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. World Energy is converting a former asphalt crude oil refinery into a 100% renewable fuels production facility, one of the cleanest fuel refineries in the world. We recognize the need for the low carbon fuels produced by World Energy at its Paramount facility to address both climate change and local air pollution. In particular, the overall cancer risk in the Paramount community will decline due to the World Energy Project.

Again, we strongly support World Energy's AltAir/World Energy Renewable Fuels Conversion Project which will refurbish the existing facility to a world class renewable energy source of the future providing responsible environmentally friendly sources of energy and building the local economy.

We appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Adam Einstoss
Project Manager

1/19/2022

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of Dassel's Energy, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

Propane is often our fleet's fuel of choice for its power, proven duty-cycle capabilities, and unlike conventional fuels, it will not degrade when stored even for decades. Innovation is driving advancements in the propane industry, including renewable propane as well as new ultra-low NOx (near-zero) engine technologies. Today's propane provides clean power for fleets that daily serve thousands of commercial, industrial, and agricultural enterprises across the state. The advent of renewable propane, derived from sustainable sources such as used cooking oil and beef tallow, now further increases the propane industry's value proposition. The California Air Resources Board (CARB) released a pathway in 2019 showing that renewable propane has a carbon footprint on par with, or in some cases even lower than that of electricity. Both traditional and renewable propane can also be blended with renewable Dimethyl Ether (DME), derived from methane capture, reducing emissions further, and depending on feedstocks may even have a negative carbon intensity value. Most importantly, the fact that renewable propane is fungible with conventional propane means our company can rapidly deploy a clean energy solution without costly infrastructure upgrades and delays to deployment. Renewable propane can be delivered and utilized right now, providing clean air benefits immediately.

DE-1

As a leader in the development of low-carbon and renewable fuels, World Energy's products will serve as crucial components to the state's decarbonization strategy. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels, such as renewable propane, from sustainable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

Windmill Propane appreciates the opportunity to provide input and support the planned Conversion Project. We hope the City of Paramount will realize the emission reductions that this essential clean energy project will provide not only to residents of Paramount, but to all Californians.

Sincerely,

Benjamin Jones,
Dassel's Energy

MAR Pizza, Inc. dba Domino's Pizza
15198 Downey Ave., Paramount, Ca. 90723

Tel.: 562-663-1400
Fax: 562-788-7435

February 2, 2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

As a longtime business owner in the City of Paramount, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. Additionally, I sit on the Board of Directors of the Paramount Chamber of Commerce for the past seven years and I believe the city has conducted a thorough environmental review under CEQA to analyze the benefits and potential impacts of the project for our community.

My business is Domino's Pizza and I've been a franchisee for 32 years. Starting with one store in 1990 to 46 stores today in Los Angeles County, along the way I purchased the Paramount Domino's in 1995. By 1999 my business grew large enough to need a headquarters office and I liked Paramount so much that it was the city I chose to open my main office! Today I employ over 50 people in Paramount and I trust and believe all are safe and free of risks due to air quality, primarily because of the good work toward air quality by Paramount and companies like World Energy.

DOM-1

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. World Energy is converting a former asphalt crude oil refinery into a 100% renewable fuels production facility, one of the cleanest fuel refineries in the world. I recognize the need for the low carbon fuels produced by World Energy at its Paramount facility to address both climate change and local air pollution. I am proud to have these cleaner renewable fuels, such as Sustainable Aviation Fuel, be developed in Paramount.

I appreciate World Energy's excellent safety record operating the facility. I support the

AltAir/World Energy Renewable Fuels Conversion Project as it will support our local economy by bringing high-paying jobs close to our homes. We know this project is cleaner for Paramount than what has been at that location for nearly a century.

In particular, the overall cancer risk in our community will decline due to the World Energy Project.

DOM-1 continued

I appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the city. Thank you for considering my remarks as a part of the public comment on this essential clean energy project.

Sincerely yours,

Tony Manos
President and Franchise Owner

EXPO PROPANE

01/19/2022

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of Expo Propane, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

Propane is often our fleet's fuel of choice for its power, proven duty-cycle capabilities, and unlike conventional fuels, it will not degrade when stored even for decades. Innovation is driving advancements in the propane industry, including renewable propane as well as new ultra-low NOx (near-zero) engine technologies. Today's propane provides clean power for fleets that daily serve thousands of commercial, industrial, and agricultural enterprises across the state. The advent of renewable propane, derived from sustainable sources such as used cooking oil and beef tallow, now further increases the propane industry's value proposition. The California Air Resources Board (CARB) released a pathway in 2019 showing that renewable propane has a carbon footprint on par with, or in some cases even lower than that of electricity. Both traditional and renewable propane can also be blended with renewable Dimethyl Ether (DME), derived from methane capture, reducing emissions further, and depending on feedstocks may even have a negative carbon intensity value. Most importantly, the fact that renewable propane is fungible with conventional propane means our company can rapidly deploy a clean energy solution without costly infrastructure upgrades and delays to deployment. Renewable propane can be delivered and utilized right now, providing clean air benefits immediately.

EP-1

As a leader in the development of low-carbon and renewable fuels, World Energy's products will serve as crucial components to the state's decarbonization strategy. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels, such as renewable propane, from sustainable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

Expo Propane appreciates the opportunity to provide input and support the planned Conversion Project. We hope the City of Paramount will realize the emission reductions that this essential clean energy project will provide not only to residents of Paramount, but to all Californians.

Sincerely,

Marty Huerta

Marty Huerta
Expo Propane

Location: 12685 Foothill Blvd, Sylmar, CA • P.O. Box 920638 Sylmar, CA 91392-0638
Telephone: (818) 838-4400 • Fax (818) 838-4406 • www.expopropane.com

PROPANE
EXCEPTIONAL ENERGY

February 1,2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

Dear Mr. Carver:

As a resident of Paramount for 40 years, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. I believe the City has conducted a thorough environmental review under CEQA to analyze the benefits and potential impacts of the project for our community.

As a concerned resident, I have experienced the state of affairs in general in our city getting better, despite the need for significant improvement in several areas (including crime, parking and a lack of a destination to attract people to visit and spend their money here). I recognize that World Energy's plan to convert the former petroleum refinery to cleaner fuels will be another key improvement in our city.

FB-1

I live just a few blocks away from the World Energy facility. I had various concerns about the environmental impact and overall safety of the facility. Recently, I took up World Energy's offer to visit the facility and get a briefing by their staff. During this tour, I learned of the extensive safety precautions throughout the buildings, tank placements & trucking fueling stations. I saw wide paths and fuel storage projects under improvement. In particular, I saw every single worker have a smile on their face and share their excitement for working at this clean energy facility. I feel World Energy has reasonably & thoroughly taken measures to protect the residents and workers of Paramount.

My neighbors and I have noticed the significant reduction in noise and odors over the past several years since World Energy acquired the facility and started to convert it to cleaner fuels. We residents can sleep better at night knowing that the facility's owner and leadership actually cares about the community. Those of us who have lived in the city for many years recall seeing giant billowing smoke clouds when emergency flares would create the potential for mayhem & stress over many years. The need for flaring is minimized by World Energy's operations, and I was impressed to learn how much cleaner these flares are compared to petroleum refineries. I recall an incident in the past when our city was all over the news for a smoke cloud and getting advisories to stay indoors. Thanks to the great work at World Energy, those days are gone.

Frankly, I am glad World Energy is our neighbor. Here, converting fatty acids from animal tallow turning into jet & automobile fuel is not a Star Trek sci-fi fantasy but a reality. Adding hydrogen, the zero emission transportation fuel, will be another step forward in cleaning the air we breathe in the Paramount area. The significant improvement in our local air quality as well as support for the local economy will benefit all of us. I can't imagine why anyone would want to go backwards by having this facility return to functioning as an oil refinery that didn't & likely won't ever generate these benefits for us.

Paramount is making a significant move towards a more sustainable future by having World Energy's clean fuel facility in our city. I implore you and the other city officials to ensure Paramount is true to the vision of a "Safe, Healthy and Attractive" city by approving the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

FB-1
continued

Kind Regards,

Fred

Fred Becerra
Resident
P.O. Box 752
Paramount, CA 90723

FUTUREPORTS

PO Box 15624
Long Beach CA 90815
office: 310.982.1323
email: info@futureports.org
www.futureports.org

January 25, 2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of FuturePorts, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

FuturePorts is a 501(c)(6) nonprofit advocacy coalition founded in 2005 to help coalesce the Southern California supply chain around the need to both grow the ports and to address the environmental, air quality, and quality of life issues that come with that growth. FuturePorts believes that a vibrant and healthy economic and environmental future for the ports is vital to us all.

California has set the national standard in developing ambitious climate targets and air quality standards. Given that the transportation sector is responsible for approximately 40% of the state's greenhouse gas emissions, developing low-carbon solutions for commercial motor vehicles and aviation will be an important part of emissions reduction plans. Deploying cleaner-burning fuels is critical to addressing the state's environmental health priorities. FP-1

As a leader in the development of low-carbon and renewable fuels, including sustainable aviation fuel, World Energy's products will serve as crucial components to the state's decarbonization strategy. World Energy processes renewable feedstock to produce clean energy. We believe the City has conducted a thorough environmental review under CEQA to analyze the benefits and potential impacts of the project.

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. We appreciate World Energy's excellent safety record operating the facility. It is noteworthy that flare events are rare at this facility and the fuel produced by World Energy's facility has less impact on public health. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels

FUTUREPORTS

PO Box 15624
Long Beach CA 90815
office: 310.982.1323
email: info@futureports.org
www.futureports.org

from renewable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

FP-1 continued

We appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Thank you,

Marnie Primmer
Executive Director
FuturePorts

GLOBAL
PUMP SERVICE
15321 Texaco Ave.
Paramount, Ca. 90723
562-547-9445

Feb. 03/2022
John Carver
Planning Director
City of Paramount
16400 Colorado Ave.
Paramount, Ca. 90723
Email: jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

As a resident and business owner in Paramount, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the cities approval or the Draft Subsequent Environmental Impact Report and Conditional Use Permit. I believe the city has conducted a thorough environmental review under CEQA To analyze the benefits and potential impacts of the project for our community.

I have been performing work in the refinery, when it was Paramount Petroleum. Since the AltAir/World Energy has Taken over its like night and day, their attention to safety and the conversion to renewable energy is amazing. I'm sure you will agree that this is a project that will greatly improve the way energy is produced and is needed going forward.

GPS-1

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. World Energy is converting a former asphalt crude oil refinery into 100% renewable fuels production facility, one of the cleanest fuel refineries in the world. I recognize the need for low carbon fuels produced by World Energy at its Paramount facility to address both climate change and local air pollution. I am proud to have these cleaner renewable fuels, such as Sustainable Aviation Fuel, be developed in Paramount.

In particular, the overall cancer risk in our community will decline due to the World Energy Project.

Sincerely
Dan V. Richter

Global Pump Service
15321 Texaco
Paramount, Ca. 90723
Ph. 562-547-9445

Kiewit

January 26, 2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

Kiewit Energy Group Inc.is pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. We are confident the City has thoroughly analyzed the benefits and potential impacts of the project under the strict guidelines of the CEQA.

Kiewit Energy Group Inc. has worked in the Paramount and LA Basin area for over 100 years. Kiewit Energy Group is one of North America's largest and most respected engineering and construction organizations who employs over 3,000 people in the State of California and prioritize local hire in the Paramount area. Kiewit is proud to support the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft SEIR and CUP. We congratulate World Energy for providing the energy sources of the future! We fully support this project and believe the Draft SEIR accurately represents this positive and environmentally responsible project. KC-1

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. World Energy is converting a former asphalt crude oil refinery into a 100% renewable fuels production facility, one of the cleanest fuel refineries in the world. We recognize the need for the low carbon fuels produced by World Energy at its Paramount facility to address both climate change and local air pollution. In particular, the overall cancer risk in the Paramount community will decline due to the World Energy Project.

Again, we strongly support World Energy's AltAir/World Energy Renewable Fuels Conversion Project which will refurbish the existing facility to a world class renewable energy source of the future providing responsible environmentally friendly sources of energy and building the local economy.

We appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Jeremy Peterson
Project Manager

KIEWIT CORPORATION
10704 Shoemaker Ave.
Santa Fe Springs, CA 90670

The Chamber
Long Beach Area Chamber of Commerce

December 21, 2021

TO:
John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

[SENT VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

We are contacting you on behalf of the Long Beach Area Chamber of Commerce, on behalf of our over 750 members throughout Long Beach. We are writing this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. The Long Beach Area Chamber of Commerce represents business interests and businesses in Long Beach, from small mom and pop shops to multi-national organizations that have a presence here.

California has set the national standard in developing ambitious climate targets and air quality standards. Given that the transportation sector is responsible for approximately 40% of the state's greenhouse gas emissions, developing low-carbon solutions for commercial motor vehicles and aviation will be an important part of emissions reduction plans. Furthermore, because vehicles powered by gasoline, diesel, and other conventional fuels produce nearly 80% of smog-forming emissions within the state, deploying cleaner-burning fuels are critical to addressing the state's environmental health priorities.

LBCC-1

As a leader in the development of low-carbon and renewable fuels, including sustainable aviation fuel, World Energy's products will serve as crucial components to the state's decarbonization strategy. World Energy processes renewable feedstock to produce clean energy. We believe the City has conducted a thorough environmental review under CEQA to analyze the benefits and potential impacts of the project.

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. We appreciate World Energy's excellent safety record operating the facility. It's noteworthy that flare events are rare at this facility and the fuel produced by World Energy's facility has less impact on public health as it does not contain high concentrations of aromatic hydrocarbons found in petroleum refineries. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels from renewable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

We appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Jeremy Harris
President & CEO
Long Beach Area Chamber of Commerce

Los Angeles County Business Federation
Strengthening the Voice of Business Since 2008

12/20/21

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Paramount Conversion Project

Dear Mr. Carver,

We are contacting you on behalf of BizFed, the Los Angeles County Business Federation, an alliance of over 200 business organizations representing 400,000 employers in the region. We are writing to express our support of the AltAir/World Energy Paramount Conversion Project and the City's approval of the Environmental Impact Report and Conditional Use Permit.

California has set the national standard in developing ambitious climate targets and air quality standards. Given that the transportation sector is responsible for approximately 40% of the state's greenhouse gas emissions, developing low-carbon solutions for commercial motor vehicles and aviation will be an important part of emissions reduction plans. Furthermore, because vehicles powered by gasoline, diesel, and other conventional fuels produce nearly 80% of smog-forming emissions within the state, deploying cleaner-burning fuels are critical to addressing the state's environmental health priorities. LACBF-1

As a leader in the development of low-carbon and renewable fuels, including sustainable aviation fuel, World Energy's products will serve as crucial components to the state's decarbonization strategy. World Energy processes renewable feedstock to produce clean energy. The Paramount facility, previously a highly polluting asphalt refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. The planned Conversation Project will allow World Energy to increase its capacity to produce low-carbon fuels from renewable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

Thank you for considering our remarks as a part of the public comment on this essential clean energy project. If you have any questions, please contact sarah.wiltfong@bizfed.org.

Sincerely,

Donna Dupperon
BizFed Chair
Torrance Area Chamber

David Fleming
BizFed Founding Chair

Tracy Hernandez
BizFed Founding CEO
IMPOWER, Inc.

BizFed Association Members

7-Eleven Franchise Owners Association of Southern California
Action Apartment Association
Alhambra Chamber of Commerce
American Beverage Association
Apartment Association of Greater Los Angeles
Apartment Association, CA Southern Cities, Inc.
Arcadia Association of Realtors
AREAA North Los Angeles SFV SCV
Armenian Trade and Labor Association
Associated Builders & Contractors, Inc. Southern California Chapter
Association of Club Executives
Association of Independent Commercial Producers
Azusa Chamber of Commerce
Bell Gardens Chamber of Commerce
Beverly Hills Bar Association
Beverly Hills Chamber of Commerce
Biocom California - Los Angeles
BICEPP
Black Business Association
BNI4SUCCESS
Bowling Centers of Southern California
Boyle Heights Chamber of Commerce
Building Industry Association - Baldyview
Building Industry Association - LA/Ventura Counties
Building Industry Association - Southern California
Building Owners & Managers Association of Greater Los Angeles
Burbank Association of REALTORS
Burbank Chamber of Commerce
Business and Industry Council for Emergency Planning and Preparedness
Business Resource Group
CA Natural Resources Producers Assoc
CalAsian Chamber
Calabasas Chamber of Commerce
California Apartment Association- Los Angeles
California Asphalt Pavement Association
California Bankers Association
California Business Properties Association
California Business Roundtable
California Cannabis Industry Association
California Cleaners Association
California Construction Industry and Materials Association
California Contract Cities Association
California Fashion Association
California Gaming Association
California Grocers Association
California Hispanic Chamber
California Hotel & Lodging Association
California Independent Oil Marketers Association (CIOMA)
California Independent Petroleum Association
California Life Sciences Association
California Manufacturers & Technology Association
California Metals Coalition
California Restaurant Association
California Retailers Association
California Small Business Alliance
California Self Storage Association
California Society of CPAs - Los Angeles Chapter
California Trucking Association
Carson Chamber of Commerce
Carson Dominguez Employers Alliance
Central City Association
Century City Chamber of Commerce
Chatsworth/Porter Ranch Chamber of Commerce
Citrus Valley Association of Realtors
Claremont Chamber of Commerce
Coalition for Renewable Natural Gas
Coalition for Small Rental Property Owners
Commercial Industrial Council/Chamber of Commerce
Construction Industry Air Quality Coalition
Construction Industry Coalition on Water Quality
Council on Trade and Investment for Filipino Americans
Covina Chamber
Crenshaw Chamber Of Commerce
Crescenta Valley Chamber of Commerce
Culver City Chamber of Commerce
Downey Association of REALTORS
Downey Chamber of Commerce
Downtown Center Business Improvement District
Downtown Long Beach Alliance
El Monte/South El Monte Chamber
El Segundo Chamber of Commerce
Employers Group
Encino Chamber of Commerce
Energy Independence Now
Engineering Contractor's Association
EXP
F.A.S.T.- Fixing Angelenos Stuck in Traffic
Friends of Hollywood Central Park
FuturePorts
Gardena Valley Chamber
Gateway to LA
Glendale Association of Realtors
Glendale Chamber
Glendora Chamber
Google Client Services, LLC
Greater Antelope Valley AOR
Greater Bakersfield Chamber of Commerce
Greater Lakewood Chamber of Commerce
Greater Leimert Park Village Crenshaw Corridor Business Improvement District
Greater Los Angeles African American Chamber
Greater Los Angeles Association of REALTORS
Greater Los Angeles New Car Dealers Association
Greater San Fernando Valley Regional Chamber
Harbor Association of Industry and Commerce
Harbor Trucking Association
Historic Core BID of Downtown Los Angeles
Hollywood Chamber
Hong Kong Trade Development Council
Hospital Association of Southern California
Hotel Association of Los Angeles
Huntington Park Area Chamber of Commerce
ICWA
Independent Cities Association
Industrial Environmental Association
Industry Business Council
Inland Empire Economic Partnership
International Cannabis Business Women Association
International Franchise Association
Irwindale Chamber of Commerce
La Cañada Flintridge Chamber
LA Fashion District BID
LA South Chamber of Commerce
Lancaster Chamber of Commerce
Larchmont Boulevard Association
Latin Business Association
Latino Food Industry Association
Latino Restaurant Association
LAX Coastal Area Chamber
League of California Cities
Long Beach Area Chamber
Long Beach Economic Partnership
Los Angeles Area Chamber
Los Angeles County Board of Real Estate
Los Angeles County Waste Management Association
Los Angeles Economic Development Corporation
Los Angeles Gateway Chamber of Commerce
Los Angeles Gay & Lesbian Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles Parking Association
MADIA Tech Launch
Malibu Chamber of Commerce
Marketplace Industry Association
Motion Picture Association of America, Inc.
MoveLA
Multicultural Business Alliance
NAIOP Southern California Chapter
Nareit
National Association of Tobacco Outlets
National Association of Waterfront Employers
National Association of Women Business Owners - CA
National Association of Women Business Owners - LA
National Federation of Independent Business
National Hookah Community Association
National Latina Business Women's Association
Orange County Business Council
Pacific Merchant Shipping Association
Pacific Palisades Chamber
Panorama City Chamber of Commerce
Paramount Chamber of Commerce
Pasadena Chamber
Pasadena Foothills Association of Realtors
PhRMA
Planned Parenthood Affiliates of California
Pomona Chamber
Rancho Southeast Association of Realtors
ReadyNation California
Recording Industry Association of America
Regional Black Chamber-San Fernando Valley
Regional Hispanic Chamber of Commerce
Regional San Gabriel Valley Chamber
Rosemead Chamber
San Dimas Chamber of Commerce
San Gabriel Chamber of Commerce
San Gabriel Valley Economic Partnership
San Pedro Peninsula Chamber
Santa Clarita Valley Chamber
Santa Clarita Valley Economic Development Corp.
Santa Monica Chamber of Commerce
Sherman Oaks Chamber
South Bay Association of Chambers
South Bay Association of Realtors
South Gate Chamber of Commerce
Southern California Contractors Association
Southern California Golf Association
Southern California Grantmakers
Southern California Leadership Council
Southern California Minority Suppliers Development Council Inc.
Southern California Water Coalition
Southland Regional Association of Realtors
Sunland/Tujunga Chamber
Sunset Strip Business Improvement District
The California Business & Industrial Alliance (CABIA)
Torrance Area Chamber
Tri-Counties Association of Realtors
United Cannabis Business Association
United Chambers – San Fernando Valley & Region
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
US Green Building Council
US Resiliency Council
Valley Economic Alliance, The
Valley Industry & Commerce Association
Vermont Slauson Economic Development Corporation
Vernon Chamber
Veterans in Business Network
Vietnamese American Chamber
Warner Center Association
West Hollywood Chamber
West Hollywood Design District
West Los Angeles Chamber
West San Gabriel Valley Association of Realtors
West Valley/Warner Center Chamber
Western Electrical Contractors Association
Western Manufactured Housing Association
Western States Petroleum Association
Westside Council of Chambers
Whittier Chamber of Commerce
Wilmington Chamber
World Affairs/Town Hall Los Angeles
World Trade Center

mass. electric construction company

January 26, 2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

Mass Electric Construction Company (MEC) is pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. We are confident the City has thoroughly analyzed the benefits and potential impacts of the project under the strict guidelines of the CEQA.

MEC has worked in the Paramount and LA Basin area for over 30 years. MEC is one of the nation's premier electrical contractors, we employ up to 1,000 people depending on projects and prioritize local hire in the Paramount area. MEC is proud to support the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft SEIR and CUP. We congratulate World Energy for providing the energy sources of the future! We fully support this project and believe the Draft SEIR accurately represents this positive and environmentally responsible project.

MEC-1

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. World Energy is converting a former asphalt crude oil refinery into a 100% renewable fuels production facility, one of the cleanest fuel refineries in the world. We recognize the need for the low carbon fuels produced by World Energy at its Paramount facility to address both climate change and local air pollution. In particular, the overall cancer risk in the Paramount community will decline due to the World Energy Project.

Again, we strongly support World Energy's AltAir/World Energy Renewable Fuels Conversion Project which will refurbish the existing facility to a world class renewable energy source of the future providing responsible environmentally friendly sources of energy and building the local economy.

We appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Brandon Parker
West Coast Area Manager

MEC
1925 Wright Ave., Suite C
La Verne, CA 91750
CA License #819912

2/1/2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

As a resident of Paramount, I'm submitting this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

I have been a resident of Paramount for over 60 years, and lived most of that time within several blocks from the refinery. It was the Douglas Oil Refinery then. It was one of the several refineries built in this area as a result of the discovery of oil in Signal Hill. This particular plant site has been a refinery for over 9 decades. being a neighbor of an oil refinery has not always been ideal. However, the Paramount facility, as it is today, has received major upgrades under World Energy's ownership, and I am very happy about that. We are in the post petroleum age, and World Energy is converting a former asphalt crude oil refinery into a 100% renewable fuels production facility, one of the cleanest fuel refineries in the world, I understand. I recognize the need for the low carbon fuels produced by World Energy at its Paramount facility to address both climate change and local air pollution. I am satisfied to have these cleaner renewable fuels, such as Sustainable Aviation Fuel, will be processed here in Paramount. MM-1

I appreciate World Energy's excellent safety record operating the facility. I support the AltAir/World Energy Renewable Fuels Conversion Project as it will support our local economy by bringing high-paying jobs close to our homes. I believe this project will be a net plus for Paramount as it seeks ways to move towards a more environmentally sustainable economy. It's a long and not always easy process, but this plant is a move in the right direction, in my opinion. I am especially excited about the proposed Innovation Center, which is indicative of the forward seeking nature of this project, and will be an asset to our community!!!

I also appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Mike McKown
Paramount resident since 1959

1/3/2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of Move LA, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. Since 2007, Move LA's mission has been to build a broad constituency of leaders in the business, labor, and environmental sectors to fight for the development of a clean public transportation system and affordable housing that will benefit the entire county of Los Angeles. We advocate for clean, diverse, and fiscally-responsible solutions that allow people of all
ages and incomes to work, live, and thrive here. These include Measures R and M, which will raise almost $120 billion for transportation by 2057, and Measure H, the ½ cent sales tax in LA County supporting the needs of our homeless neighbors.

California has set the national standard in developing ambitious climate targets and air quality standards. Given that the transportation sector is responsible for approximately 40% of the state's greenhouse gas emissions, developing low-carbon solutions for commercial motor vehicles and aviation will be an important part of emissions reduction plans. Furthermore, because vehicles powered by gasoline, diesel, and other conventional fuels produce nearly 80% of smog-forming emissions within the state, deploying cleaner-burning fuels are critical to addressing the state's environmental health priorities.

MLA-1

We believe that is crucial to find uses for biomass and waste as renewable sources of clean energy. As a leader in the development of low-carbon and renewable fuels, including sustainable aviation fuel, World Energy's products can serve as crucial components to the state's decarbonization strategy. World Energy has shown through its current operations that it can operate safely to produce clean fuels and be a good neighbor to surrounding communities by reducing its impact on public health and providing good-paying jobs with family-sustaining benefits to local residents. Move LA supports the planned Conversion Project to allow World Energy to convert its crude oil operating capacity to produce additional low-carbon fuels from renewable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

We appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Eli Lipmen
Move LA

10 February 2022

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

The advent of renewable propane, derived from sustainable sources such as used cooking oil and beef tallow, now further increases the propane industry's value proposition. The California Air Resources Board (CARB) released a pathway in 2019 showing that renewable propane has a carbon footprint on par with, or in some cases even lower than that of electricity. Both traditional and renewable propane can also be blended with renewable Dimethyl Ether (DME), derived from methane capture, reducing emissions further, and depending on feedstocks may even have a negative carbon intensity value. Most importantly, the fact that renewable propane is fungible with conventional propane means delivery companies can rapidly deploy a clean energy solution without costly infrastructure upgrades and delays to deployment. Renewable propane can be delivered and utilized right now, providing clean air benefits immediately.

NC-1

As a leader in the development of low-carbon and renewable fuels, World Energy's products will serve as crucial components to the state's decarbonization strategy. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels, such as renewable propane, from sustainable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

As a native Californian, I appreciate the opportunity to provide input and support the planned Conversion Project. I hope the City of Paramount will realize the emission reductions that this essential clean energy project will provide not only to residents of Paramount, but to all Californians.

Sincerely,

Nancy Coop
Dana Point, California
nancyjcoop@gmail.com

February 3, 2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear John,

As a lifelong resident of Paramount, I have been following the renewable fuels conversion project proposal and the impact of said project to myself and the community who live in the immediate area of the plant 24-7.

Again, as a lifelong resident of Paramount, and literally living within eye and earshot of the plant for over 50 years, I grew up being aware firsthand of the dangers living in close proximity to a petroleum processing facility. Imagine being woken by flares in the night, huge in size enough to brighten up the sky as if dawn had arrived early. At times, the fumes being so noxious that we were not allowed to play outdoors for long before my asthma symptoms would kick in. Of course, these memories made me keenly aware of the negative impact that an industry can have to a community and wary of the business occurring at this facility.

RGP-1

Forward to 2022, I understand that today the Paramount facility has received significant upgrades and is a far cleaner plant under World Energy's ownership. I understand that World Energy is converting a former asphalt crude oil refinery into a 100% renewable fuels production facility, one of the cleanest fuel refineries in the world. While I recognize the need for the low carbon fuels produced by World Energy at its Paramount facility to address both climate change and local air pollution, the progress of business should never occur at the expense of the health of a community. I feel with this project, we are moving towards a healthier Paramount. As a UC Master Gardener, I am keenly aware of the impact of particulates in our air and ground water to not only our human communities but plant organisms as well. I hope that with this project, both the city of Paramount and Alt Air/World Energy will invest in environmental and educational opportunities, as well as financially support our regional environmental agencies to help move Paramount into safe place to live, work and breathe.

I support the AltAir/World Energy Renewable Fuels Conversion Project as I feel it will support our local economy by bringing high-paying jobs close to our homes and continue to contribute to a cleaner environment for the residents of Paramount.

I appreciate the opportunity to provide public comment in writing. Thank you for considering my remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Rebecca Guillen Perez
8427 Ives Street, Paramount, CA 90723

January 19, 2022

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of ROUSH CleanTech, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

Roush Enterprises is an industry-leading supplier of integrated engineering, prototyping, testing and manufacturing services and has served the automotive industry for almost 50 years. ROUSH CleanTech is a subsidiary of Roush Enterprises and focuses on developing advanced clean transportation and eMobility solutions across multiple technologies. As a Ford Qualified Vehicle Manufacturer (QVM)-certified alternative fuel and electric vehicle manufacturer, ROUSH CleanTech has deployed nearly 40,000 advanced clean transportation vehicles to over 2,600 unique customers in every state in the US and Provence in Canada and accumulated over 1 billion miles in every driving condition. ROUSH CleanTech's current portfolio of commercial products include propane autogas and electric propulsion technology solutions for medium-duty trucks, school and transit buses.

Propane has continued to grow as a preferred fleet choice because of its superior cost effectiveness, ultra-low emissions, lower maintenance headaches and costs and domestic production benefits. In fact, propane represents almost 30% of Blue Bird Bus Companies annual school bus volume. The growing availability of renewable propane and renewable Dimethyl Ether (DME) blends paired with Roush's ultra-low NOx engine technology allows fleets to deploy an alternative that is lower in criteria pollutants and GHG emissions and achieves these benefits at the lowest cost of any alternative to diesel. Most importantly, the fact that renewable propane is fungible with conventional propane means our customers can rapidly deploy a clean energy solution without costly infrastructure upgrades and delays to deployment. Renewable propane can be delivered and utilized right now, providing clean air benefits immediately. This is of key interest to fleet organizations dealing with the consequences and overwhelm of the big shift in mobility that is driving operational costs up.

RCT-1

As a developer of engine technology that supports customers across North America in a very diverse set of duty cycles, geographies and access to resources across all medium-duty transportation modes, the availability of low-carbon and renewable fuels is critical. World Energy's products will serve as crucial components to the state's decarbonization strategy. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels, such as renewable propane, from sustainable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

RCT-1
continued

ROUSH CleanTech appreciates the opportunity to provide input and support the planned Conversion Project. We hope the City of Paramount will realize the emission reductions that this essential clean energy project will provide not only to residents of Paramount, but to all Californians.

Sincerely,

Chelsea Jenkins

Chelsea Jenkins
Vice President of Government and Industry Relations
ROUSH CleanTech

Sacramento Clean Cities Coalition

January 19, 2022

Mr. John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for World Energy Renewable Fuels Conversion Project

Dear Mr. Carver:

The Sacramento Clean Cities Coalition (SCCC) strongly supports the AltAir/World Energy Renewable Fuels Conversion Project and encourages the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

The SCCC is committed to supporting strategies that allow for the implementation of low- and zero-emission transportation technologies. The AltAir project will produce renewable propane. There are very low-emission engines designed to run on propane, and when vehicles with these engines are also operating on renewable propane, their greenhouse gas emissions (GHG) are also very low, making the use of these vehicles a cost-effective way to help achieve California's air quality and climate goals.

SCCC-1

Propane has provided great opportunities for fleets, including school bus fleets, who are budget conscious and concerned about the carbon footprint of their vehicles. The advent of renewable propane provides a clean energy solution that can be deployed immediately, providing a pathway for many that are unable to use electric buses either due to range challenges or infrastructure costs. The World Energy facility will also enable in-state production, assisting all Californians with a relatively local option for obtaining the low GHG solution.

We appreciate the opportunity to provide input and support the planned Conversion Project. We hope the City of Paramount will realize the emission reductions that this clean energy project will provide to all Californians.

Sincerely,

Tim Taylor
Executive Director, Sacramento Clean Cities Coalition
(916) 206-2911

South Gate CHAMBER OF COMMERCE

December 28, 2021

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of South Gate Chamber of Commerce, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. South Gate Chamber of Commerce mission is to organize and advance the general welfare and prosperity of the South Gate businesses so that its citizens and business community prosper. Chamber is formed to encourage the highest standards of business interests of its members, to foster and further the American principal of free enterprise in the city of South Gate.

California has set the national standard in developing ambitious climate targets and air quality standards. Given that the transportation sector is responsible for approximately 40% of the state's greenhouse gas emissions, developing low-carbon solutions for commercial motor vehicles and aviation will be an important part of emissions reduction plans. Furthermore, because vehicles powered by gasoline, diesel, and other conventional fuels produce nearly 80% of smog-forming emissions within the state, deploying cleaner-burning fuels are critical to addressing the state's environmental health priorities.

SGCC-1

As a leader in the development of low-carbon and renewable fuels, including sustainable aviation fuel, World Energy's products will serve as crucial components to the state's decarbonization strategy. World Energy processes renewable feedstock to produce clean energy. We believe the City has conducted a thorough environmental review under CEQA to analyze the benefits and potential impacts of the project.

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. We appreciate World Energy's excellent safety record operating the facility. It's noteworthy that flare events are rare at this facility and the fuel produced by World Energy's facility has less impact on public health as it does not contain high concentrations of aromatic hydrocarbons found in petroleum refineries. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels from renewable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

We appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Ana Elizarraras
Executive Director

3350 Tweedy Blvd. South Gate, CA 90280 Tel 323-567-1203 Email: info@southgatecc.org Website: www.southgatecc.org
Facebook: TheSouthGateChamber Instagram: @TheSouthGateChamber Twitter: @SoGateChamber1

SOUTHEAST LOS ANGELES COUNTY
WORKFORCE DEVELOPMENT BOARD
A proud partner of
America's JobCenter of California℠

December 10, 2021

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
[VIA EMAIL: jcarver@paramountcity.com]

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of the Southeast Los Angeles County Workforce Development Board (SELACO WDB), serving the cities of Artesia, Bellflower, Cerritos, Downey, Hawaiian Gardens, Lakewood, Norwalk, and Paramount, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit. The SELACO WDB's mission is to connect local businesses to a skilled workforce so that local job seekers secure opportunities for self-sufficiency and businesses can successfully contribute to our local economy. World Energy's commitment to hiring locally for green, providing well-paying jobs, prioritizing safety, operating excellence, promoting the well-being of the Paramount community, and their commitment to supporting schools and community organizations lead to a perfect alignment with the SELACO WDB mission. Working in partnership with World Energy will enhance the SELACO WDB's opportunity to lead local job seekers to jobs that are safe, pay livable wages and provide opportunities for advancement. WDB-1

California has set the national standard in developing ambitious climate targets and air quality standards. Given that the transportation sector is responsible for approximately 40% of the state's greenhouse gas emissions, developing low-carbon solutions for commercial motor vehicles and aviation will be an important part of emissions reduction plans. Furthermore, because vehicles powered by gasoline, diesel, and other conventional fuels produce nearly 80% of smog-forming emissions within the state, deploying cleaner-burning fuels are critical to addressing the state's environmental health priorities.

As a leader in the development of low-carbon and renewable fuels, including sustainable aviation fuel, World Energy's products will serve as crucial components to the state's decarbonization strategy. World Energy processes renewable feedstock to produce clean

10900 E. 183rd Street • Suite 350 • Cerritos CA 90703
(562) 402-9336 • Fax (562) 860-4701 • www.selacowdb.com
For information selaco@selaco.com
Serving our eight cities:
Artesia, Bellflower, Cerritos, Downey, Hawaiian Gardens, Lakewood, Norwalk and Paramount

energy. We believe the City has conducted a thorough environmental review under CEQA to analyze the benefits and potential impacts of the project.

The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. We appreciate World Energy's excellent safety record operating the facility. It's noteworthy that flare events are rare at this facility and the fuel produced by World Energy's facility has less impact on public health as it does not contain high concentrations of aromatic hydrocarbons found in petroleum refineries. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels from renewable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

WDB-1 continued

We appreciate the opportunity to provide public comment in writing and at upcoming public meetings organized by the City. Thank you for considering our remarks as a part of the public comment on this essential clean energy project.

Sincerely,

Yolanda L. Castro
SELACO WDB

TED JOHNSON PROPANE
5140 Elton St. Baldwin Park, CA 91706
P: 626-337-1222 **F:** 626-338-4194
TedJohnsonPropane.com

January 14, 2022

John Carver, Planning Director City of Paramount

16400 Colorado Avenue Paramount, CA 90723

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

Propane is our fleet's fuel of choice for its power, proven duty-cycle capabilities, and low emission benefits. Innovation is driving advancements in the propane industry, including renewable propane as well as new ultra-low NOx (near-zero) engine technologies. Propane provides clean power for fleets that daily serve thousands of businesses and homes in California. We, at Ted Johnson Propane, serve the SCAQMD region and our customers who are fleet managers are asking us to supply them with renewable propane.

TJP-1

World Energy's products will serve as crucial components to the state's decarbonization strategy. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels, such as renewable propane, from sustainable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

The California Air Resources Board (CARB) released a pathway in 2019 showing that renewable propane has a carbon footprint on par with, or in some cases even lower than that of electricity. Most importantly, the fact that renewable propane is fungible with conventional propane means our company can rapidly deploy a clean energy solution without costly infrastructure upgrades and delays to deployment. Renewable propane can be delivered and utilized right now, providing clean air benefits immediately.

I appreciates the opportunity to provide input and support the planned Conversion Project. I hope the City of Paramount will realize the emission reductions that this essential clean energy project will provide not only to residents of Paramount, but to all Californians. If you have any questions, please reach out to me.

Sincerely,

TED JOHNSON PROPANE CO.

Julie Johnson

President

8049 Somerset Blvd.
Paramount, California 90723
562.220.1450
www.total-western.com

2/3/2022

Mr. John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

RE: Support for Alt Air/ World Energy Renewable Fuels Conversion Project

Dear Mr. Carver:

Total-Western is pleased to submit this letter in support of the Alt Air / World Energy Renewable Fuels Conversion Project. With roots dating back to 1972 and office locations across the Western United States, Total-Western is headquartered here in Paramount, CA. Total-Western is an active leader in designing, building, operating, and maintaining sustainable and renewable industrial projects throughout the United States. These types of projects include biofuels, natural resource recovery, biodegradable plastics, renewable power, and concentrated solar.

TWI-1

Total-Western has been a partner of Alt Air/World Energy for almost 30 years. As the world continues to transition away from fossil fuels, I am so proud that a local organization has been proven to be a leader within the renewable fuels industry. Alt Air / World Energy has supported the local community and this project will enable continued support and growth for the city of Paramount.

Regards,

Ryan Roehling
Division Manager
Total-Western, Inc.

Aaron Robinson
Senior Manager
Environmental Sustainability

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

January 21, 2022

Re: Support for AltAir / World Energy Renewable Fuels Conversion Project

Dear Mr. Carver:

On behalf of United Airlines, this letter is to express our support of the AltAir / World Energy Renewable Fuels Conversion Project and the City of Paramount's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

As you may know, United Airlines is a major customer of World Energy and the AltAir Paramount facility in particular, which since 2016 has been our sole source of sustainable aviation fuel (SAF). World Energy's SAF, which we use to partially power every United departure from Los Angeles International Airport (LAX), offers nearly 80% reductions in lifecycle greenhouse gas emissions, as well as lower NO_x, SO_x, and particulate matter. Since 2016 we have purchased approximately 1 million gallons of SAF per year from World Energy, but this is a small fraction of the approximately 175 million gallons of jet fuel we use at LAX, or the more than 4 billion gallons of jet fuel system-wide, that we use in a typical year. We need substantially more SAF in order to achieve our goal of net-zero emissions. UA-1

California has set the national standard in developing ambitious climate targets and air quality standards. Given that the transportation sector is responsible for approximately 40% of the state's greenhouse gas emissions, developing low-carbon solutions for commercial motor vehicles and aviation will be an important part of emissions reduction plans. Furthermore, because vehicles powered by gasoline, diesel, and other conventional fuels produce nearly 80% of smog-forming emissions within the state, deploying cleaner-burning fuels are critical to addressing the state's environmental health priorities.

As a leader in the development of low-carbon and renewable fuels, including SAF, World Energy's products will serve as crucial components to the state's decarbonization strategy. World Energy processes renewable feedstock to produce clean energy. The Paramount facility, previously a petroleum refinery, has received significant upgrades and is a far cleaner plant under World Energy's ownership. We appreciate that the fuel produced by World Energy's facility has less impact on public health as it does not contain high concentrations of aromatic hydrocarbons found in petroleum refineries. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels from renewable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

Thank you for considering our remarks as a part of the public comment on this important clean energy project.

Sincerely,

Aaron Robinson

233 South Wacker Drive, 11th Floor – WHQEN
Chicago, IL 60606

VAN UNEN MIERSMA PROPANE

John Carver, Planning Director

January 19, 2022

City of Paramount

16400 Colorado Avenue

Paramount, CA 90723

jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of Van Unen Miersma Propane, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

Propane is often our fleet's fuel of choice for its power, proven duty-cycle capabilities, and unlike conventional fuels, it will not degrade when stored even for decades. Innovation is driving advancements in the propane industry, including renewable propane as well as new ultra-low NOx (near-zero) engine technologies. Today's propane provides clean power for fleets that daily serve thousands of commercial, industrial, and agricultural enterprises across the state. The advent of renewable propane, derived from sustainable sources such as used cooking oil and beef tallow, now further increases the propane industry's value proposition. The California Air Resources Board (CARB) released a pathway in 2019 showing that renewable propane has a carbon footprint on par with, or in some cases even lower than that of electricity. Both traditional and renewable propane can also be blended with renewable Dimethyl Ether (DME), derived from methane capture, reducing emissions further, and depending on feedstocks may even have a negative carbon intensity value. Most importantly, the fact that renewable propane is fungible with conventional propane means our company can rapidly deploy a clean energy solution without costly infrastructure upgrades and delays to deployment. Renewable propane can be delivered and utilized right now, providing clean air benefits immediately.

VUM-1

VAN UNEN MIERSMA PROPANE

As a leader in the development of low-carbon and renewable fuels, World Energy's products will serve as crucial components to the state's decarbonization strategy. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels, such as renewable propane, from sustainable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

VUM-1 continued

Van Unen Miersma Propane appreciates the opportunity to provide input and support the planned Conversion Project. We hope the City of Paramount will realize the emission reductions that this essential clean energy project will provide not only to residents of Paramount, but to all Californians.

Sincerely,

Jerry Behlen

Van Unen Miersma Propane

February 2, 2022

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

Dear Mr. Carver,

As a resident of Paramount, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project.

I grew up in the City of Paramount, being a resident for over 20 years. Having attended Paramount High School, I would always see smoke coming out of the Paramount facility across the street, hearing negative comments on the facility. Having the opportunity to intern at World Energy as an engineer helped me realize how much of a positive impact World Energy is having. They took this asphalt/ crude oil refinery that I would hear negative remarks about, and under World Energy's ownership, upgraded it to a much cleaner, 100% renewable fuels facility. This is definitely a step forward in addressing climate change and local air pollution, especially with the growing demand for cleaner fuels.

I have nothing but good things to say about my time at World Energy. I got to see first-hand the value World Energy puts on prioritizing safety and supporting the community. Because of this, I support the AltAir/World Energy Renewable Fuels Conversion Project. The best part of being part of World Energy was seeing how much they support our community at events around the city, and being a good neighbor. World Energy provides jobs to the city, hiring locally like in my case, and the conversion project will only bring more jobs close to our homes.

VL-1

I appreciate the opportunity to provide feedback on this project, especially as a resident of the City of Paramount. Thank you for considering my opinion as part of the public comment on this clean energy project.

Sincerely,

Victor Lopez
15552 Virginia Ave.
Paramount, CA 90723

January 19, 2022

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

The Western Propane Gas Association (WPGA) expresses our strong support of the World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

Our association represents over 100 companies who deliver propane throughout the state of California. WPGA values our role in aiding California's transition to cleaner energy and is a leading international proponent for renewable propane. In 2020, WPGA set forth an ambitious sustainability statement to provide 100% renewable propane to Californians by 2030. The production of renewable propane is fundamental to achieving this goal. The amount of renewable propane produced by the Renewable Fuels Conversion Project is transformative, producing enough gallons to satisfy a sizable amount of California's propane transportation demand. Further, this benefit can be realized almost immediately, as renewable propane is fungible with its conventional counterpart. This will allow fleets to use the renewable molecule as soon as it can be delivered, accelerating the state's path to carbon neutrality.

WPGA-1

Propane powers many vehicle types including delivery trucks, transit fleets, and school buses. School districts of all sizes use propane buses for the low total cost-of-ownership and the fact that deployment does not require costly infrastructure upgrades. These savings could help schools afford more teachers or other necessary investments. Propane vehicles also provide energy resiliency and durability for extended routes, ensuring reliable transport.

The California Air Resources Board recognizes the value of renewable propane within the framework of the Low Carbon Fuel Standard (LCFS). The demand for renewable propane is here and only expected to grow. Permitting this facility will ensure the demand does not go unmet.

WPGA appreciates the opportunity to provide input and support the planned Conversion Project. Please do not hesitate to contact me with any additional questions.

Sincerely,

Ben Granholm
Regulatory Affairs Specialist

WESTERN PROPANE SERVICES, INC.®

January 17, 2022

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of Western Propane Services, Inc., I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

Propane is often our fleet's fuel of choice for its power, proven duty-cycle capabilities, and unlike conventional fuels, it will not degrade when stored even for decades. Innovation is driving advancements in the propane industry, including renewable propane as well as new ultra-low NOx (near-zero) engine technologies. Today's propane provides clean power for fleets that daily serve thousands of commercial, industrial, and agricultural enterprises across the state.

The advent of renewable propane, derived from sustainable sources such as used cooking oil and beef tallow, now further increases the propane industry's value proposition. The California Air Resources Board (CARB) released a pathway in 2019 showing that renewable propane has a carbon footprint on par with, or in some cases even lower than that of electricity. Both traditional and renewable propane can also be blended with renewable Dimethyl Ether (DME), derived from methane capture, reducing emissions further, and depending on feedstocks may even have a negative carbon intensity value. Most importantly, the fact that renewable propane is fungible with conventional propane means our company can rapidly deploy a clean energy solution without costly infrastructure upgrades and delays to deployment. Renewable propane can be delivered and utilized right now, providing clean air benefits immediately.

WPS-1

As a leader in the development of low-carbon and renewable fuels, World Energy's products will serve as crucial components to the state's decarbonization strategy. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels, such as renewable propane, from sustainable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

WPS-1 continued

Western Propane Services appreciates the opportunity to provide input and support the planned Conversion Project. We hope the City of Paramount will realize the emission reductions that this essential clean energy project will provide not only to residents of Paramount, but to all Californians.

Sincerely

Dan Burkhart
President

12600 Western Ave., Garden Grove, CA 92841 Ph. 714-893-9329 Fax 714-908-2545 www.gassydan.com

1/19/2022

John Carver, Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723
jcarver@paramountcity.com

RE: Support for AltAir/World Energy Renewable Fuels Conversion Project

Dear Mr. Carver,

On behalf of Windmill Propane, I am pleased to submit this letter in support of the AltAir/World Energy Renewable Fuels Conversion Project and the City's approval of the Draft Subsequent Environmental Impact Report and Conditional Use Permit.

Propane is often our fleet's fuel of choice for its power, proven duty-cycle capabilities, and unlike conventional fuels, it will not degrade when stored even for decades. Innovation is driving advancements in the propane industry, including renewable propane as well as new ultra-low NOx (near-zero) engine technologies. Today's propane provides clean power for fleets that daily serve thousands of commercial, industrial, and agricultural enterprises across the state. The advent of renewable propane, derived from sustainable sources such as used cooking oil and beef tallow, now further increases the propane industry's value proposition. The California Air Resources Board (CARB) released a pathway in 2019 showing that renewable propane has a carbon footprint on par with, or in some cases even lower than that of electricity. Both traditional and renewable propane can also be blended with renewable Dimethyl Ether (DME), derived from methane capture, reducing emissions further, and depending on feedstocks may even have a negative carbon intensity value. Most importantly, the fact that renewable propane is fungible with conventional propane means our company can rapidly deploy a clean energy solution without costly infrastructure upgrades and delays to deployment. Renewable propane can be delivered and utilized right now, providing clean air benefits immediately.

WP-1

As a leader in the development of low-carbon and renewable fuels, World Energy's products will serve as crucial components to the state's decarbonization strategy. The planned Conversion Project will allow World Energy to increase its capacity to produce low-carbon fuels, such as renewable propane, from sustainable sources to meet growing local demand for alternative fuels and provide high-paying green jobs as the state transitions to a clean energy economy.

Windmill Propane appreciates the opportunity to provide input and support the planned Conversion Project. We hope the City of Paramount will realize the emission reductions that this essential clean energy project will provide not only to residents of Paramount, but to all Californians.

Sincerely,

Benjamin Jones,
Windmill Propane