



South Coast  
Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

E-mailed: July 21, 2011  
jadams@cityofwhittier.org

July 21, 2011

Mr. Jeff Adams  
Planning Division  
13230 Penn Street  
Whittier, CA 90602

**Review of the Draft Environmental Impact Report (Draft EIR)  
for the Whittier Main Oilfield Development Project CUP 09-004**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final Environmental Impact Report (EIR) as appropriate.

Based on a review of the draft EIR the AQMD staff is concerned about the significant air quality and climate change impacts from the proposed project. As a result, the AQMD staff recommends that the lead agency require additional mitigation measures to reduce on-road and off-road diesel equipment exhaust emissions from the proposed project during construction and operational activities. Also, the lead agency should incorporate performance standards and emissions targets into mitigation measure AQ-4 to optimize greenhouse gas emissions reductions and reduce the project's climate change impacts to less than significant. Further, AQMD staff is concerned about the project's potential odor impacts; therefore, the lead agency should disclose the project's potential offsite hydrogen sulfide concentrations in light of the hydrogen sulfide (H<sub>2</sub>S) detection limits identified in the draft EIR. Details regarding these comments are enclosed.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the final EIR. Further, staff is available to work with the lead agency to address these issues and any

other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

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

Attachment

[IM:DG](#)

LAC110607-10  
Control Number

### Significant Localized Operational Emissions and Mitigation Measures

1. In Table 4.1-10 (Proposed Project Operational Criteria Emissions) the lead agency indicates that the project's peak daily emissions for NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> exceed the AQMD's localized significance threshold. For example, the localized operational NO<sub>x</sub> emissions threshold for the project is 126 pounds per day and the project will result in 887 pounds of NO<sub>x</sub> per day, however, the lead agency determines that the project's operational impacts are insignificant. Therefore, the AQMD staff recommends that the lead agency provide further evidence demonstrating that the project will have less than significant localized impacts in the final EIR.

In addition, to reduce the project's localized operational air quality impacts the lead agency should revise the first bullet of mitigation measure AQ-2b as follows:

- ✓ All drilling engines shall meet the Tier 4 emission standards, where available. In addition, all drilling engines shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the lead agency shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

### Construction and Test Drilling Mitigation Measures

2. Given that the lead agency's construction air quality analysis demonstrates significant regional and localized air quality impacts from NO<sub>x</sub> emissions the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15126.4. Specifically, AQMD staff recommends that the lead agency replace the first requirement (first bullet) of Mitigation Measure AQ-1d with the following:

- ✓ All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the lead agency shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

Also, AQMD staff recommends that the lead agency revise the sixth bullet in mitigation measure AQ-1d to provide additional mitigation for off-road dump trucks. Specifically, the AQMD staff recommends that the lead agency revise this bullet as follows:

- ✓ During the pad and access road grading phase, all off-road dump trucks shall meet EPA 2010 model year NO<sub>x</sub> emission requirements. If the lead agency determines that a 2010 model year truck fleet or portion thereof cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NO<sub>x</sub> emissions requirements. In the event that the project's fleet requirements cannot be met with 2010 or 2007 EPA model year truck emissions or portion thereof the lead

agency should require a certified NO<sub>x</sub> emissions level of less than 2.0g/bhp-hr for trucks used at the project site during the pad and access road grading phase.

Further, given that there are sensitive receptors surrounding the project site (i.e., residences and a school) the AQMD staff recommends in addition to the measures above the lead agency provide measures to further reduce the project's localized air quality impacts from PM<sub>10</sub> and PM<sub>2.5</sub> emissions. For example, the lead agency should coordinate with school staff to minimize operational activities during playground hours at the nearby school and during peak hours for outdoor activities at the nearby residences.

#### Greenhouse Gas Emissions Mitigation

3. Mitigation measure AQ-4 requires the project proponent to implement a program to quantify and reduce GHG emissions. Further, the lead agency identifies measures and programs that could be implemented to reduce GHG emissions, such as planting trees, installing solar panels on city building and structures, and obtaining offsets through the Climate Action Reserve. However, the lead agency does not set performance standards and feasibility standards for mitigation measure AQ-4. Without these components, the mitigation measure does not have any enforceable mechanism to actually reduce GHG emissions from this project. As the 14,720 metric tons of CO<sub>2</sub>e per year from the operation of this project are considered a significant impact, the lead agency must ensure that enforceable measures are in place to reduce GHG emissions. Also, the lead agency should note that AQMD's Regulation XXVII provides a voluntary program for certified GHG emissions reductions.

#### Odor/Hydrogen Sulfide Emissions

4. In Section 4.1.4.3 (Potential Operations Odor Emissions) the lead agency indicates that sulfur compounds found in oil and gas have very low odor thresholds. Specifically, the lead agency states that H<sub>2</sub>S can be detected by humans at concentrations from 0.5 parts per billion (ppb) to 40ppb (0.5 ppb detected by 2 percent of the population and 40 ppb qualified as annoying by 50 percent of the population). However, the lead agency does not present the potential maximum concentrations of H<sub>2</sub>S released by the proposed project nor does the lead agency disclose the impact of the release of H<sub>2</sub>S to nearby receptors (i.e., the school, park, and residences). Therefore, the AQMD staff recommends that the lead agency explain the aforementioned detection limits in light of the proposed project in the final EIR.