(Due by June 10th, 2016)

To Ms. Jillian Wong

c/o Office of Planning, Rule Development

and Area Sources/CEQA)

(Via facsimile to (909) 396-3324

or e-mail at [jwong1@aqmd.gov](mailto:jwong1@aqmd.gov))

and to

Mr. Danny Luong

Senior Enforcement Manager

[dluong@aqmd.gov](mailto:dluong@aqmd.gov)

South Coast Air Quality Management District

Re: Comments Opposing Approval of both the Draft Environmental Impact Report (DEIR) and the Title V Permit for the Tesoro Los Angeles Refinery Integration and Compliance Project (LARIC)

Dear Ms. Wong and Mr. Luong,

This letter is to oppose the Draft Environmental Impact Report (DEIR) and the Title V Permit for the Tesoro LARIC Project,[[1]](#footnote-1) including construction of massive new storage tanks to hold millions of barrels of crude oil, increase crude oil going through the refinery, add a dozen new pressure relief device connections to flares, increase use of 22 large refinery heaters, import Liquefied Petroleum Gas by rail to the refinery, and more.

The DEIR and the Title V Permit (which sets permit limits) are inaccurate. They ignore Tesoro’s own published plans to bring dangerous N. Dakota Bakken crude oil by rail to the Tesoro Savage Vancouver Washington ship terminal,[[2]](#footnote-2) then by ship to the Los Angeles refinery.[[3]](#footnote-3) This crude oil is particularly explosive.[[4]](#footnote-4) A Bakken crude oil rail accident blew up an entire town in 2013, killing many people.[[5]](#footnote-5) Just last Saturday another crude oil train carrying this material exploded, requiring evacuation of an elementary school, and spilling oil into the Columbia River.[[6]](#footnote-6) Bakken crude also contains high levels of volatile and toxic air contaminants and the DEIR should evaluate this threat. Tesoro’s Project could also bring extreme Canadian tar sands crude oil to the LA refinery through the same Tesoro Savage ship terminal. These two crude oils cause increased greenhouse gases and harms to air, land, and water during extraction, and add explosion risks in storage and in refineries.

The DEIR and Title V permit also failed to count air emissions from flaring during startup, shutdown, and maintenance, other air emissions increases, and failed to set permit conditions that would prevent these increased emissions.

Our community already suffers from too much air pollution and dangers of petroleum storage, pipelines, and refining. We want to stop the expansion of oil refineries, to start building our safe, healthy, and clean energy future, and to have a fair public process.

Sincerely,

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Attachment:



1. http://www.aqmd.gov/home/library/documents-support-material/lead-agency-permit-projects/permit-project-documents---year-2016 [↑](#footnote-ref-1)
2. Tesoro just received a two-year extension on the lease for this terminal. <https://www.vancouverenergyusa.com/> [↑](#footnote-ref-2)
3. Tesoro’s map showing this is attached, from: Simmons Energy Conference, *Transformation through Distinctive Performance,* February 27, 2014, <http://phx.corporate-ir.net/phoenix.zhtml?c=79122&p=irol-presentations>

   Tesoro made the following and many other statements about bringing Bakken crude to LA: *“When you think about formalizing competitive advantage and fully integrating our value chain, that is really what the Los Angeles Integration and Compliance Project is about. And when we think about creating value, we are not just thinking about advantaged crude oils in front of our refineries, but we're thinking about how that supply to the west coast of advantaged crude oils can change the shape of the crude oil supply/demand dynamics for the west coast. And that's what we are trying to accomplish through Vancouver Energy.”* Edited Transcript TSO - Tesoro Corporation 2015 Analyst and Investor Day, December 09, 2015, p. 10, Keith Casey, Tesoro Corporation, EVP Operations [↑](#footnote-ref-3)
4. U.S. Department of Transportation, 2014, available at: http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/1\_2\_14%20Rail\_Safety\_Alert.pdf [↑](#footnote-ref-4)
5. http://www.earthisland.org/journal/index.php/eij/article/warning\_highly\_flammable/ [↑](#footnote-ref-5)
6. Oregon Public Broadcasting (OPB), 6/7/2016, New Spilled Crude Oil Discovered At Mosier Train Crash, <http://www.opb.org/news/series/oil-trains/oregon-oil-train-mosier-derailment-cleanup-spill/> [↑](#footnote-ref-6)