San Diego County Air Pollution Control District

January 23, 2025

City of National City
Attn: David Welch, Associate Planner – Planning Department
1243 National City Boulevard
National City, CA 91950
dwelch@nationalcityca.gov

Re: San Diego Clean Fuels Facility LLC Project

Dear Mr. Welch,

The San Diego County Air Pollution Control District (SDAPCD) appreciates the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the San Diego Clean Fuels Terminal LLC Project. Below are the SDAPCD's comments concerning the evaluation of potential air quality impacts presented in the EIR.

Project Location

In our comment letter dated June 6, 2024, regarding the scoping meeting and initial study we requested an alternate location be evaluated since the project location is in the Portside Environmental Justice Community (Portside Community). The only alternate location evaluated in the DEIR for San Diego County was also located within the Portside Community (3202 Hoover Avenue, National City). The SDAPCD recommends the analysis also consider other project locations outside the Portside Community given the disproportionate burdens from exposure to air pollutants that residents of this community are already experiencing.

Ongoing Compliance

Given that the air quality analysis in the DEIR heavily relies on the number of heavy-duty truck trips, the SDAPCD strongly recommends that the DEIR explicitly state that permits for the facility will include conditions to limit truck trips and/or impose throughput limitations for all fuels transferred at the proposed facility. This measure is essential to ensure ongoing compliance with CEQA requirements, as any increase in truck trips could result in air emissions exceeding significance thresholds.

The Initial Study concludes that odors associated with this operation would have a less-than-significant impact. However, the DEIR lacks sufficient information to substantiate this conclusion. Considering the potential for odor generation from the proposed operation, it is strongly recommended to evaluate ongoing compliance with regulatory requirements designed

to prevent public nuisances. For reference, we have included a link to the SDAPCD's public nuisance regulations[1].

Emission Reduction Strategies

As noted in the DEIR, this project will include 138 daily heavy-duty truck trips and 42 passenger automobile trips associated with the onsite workers in addition to emissions from construction equipment and from locomotives and switching engines.

The Portside Community bears a disproportionate air quality burden, largely attributed to diesel particulate matter (DPM) emissions from goods movement activities, industrial operations, and transportation corridors serving the nearby port terminals. DPM, a key component of diesel exhaust, is classified as a toxic air contaminant and can pose significant health risks, including respiratory and cardiovascular diseases, as well as an elevated risk of cancer. The dense concentration of diesel-powered equipment, such as trucks, ships, and cargo handling equipment, exacerbates the exposure of residents to harmful pollutants. This community, already identified as a vulnerable population due to socioeconomic and health disparities, continues to experience heightened health risks from cumulative DPM exposure, underscoring the urgent need for mitigation efforts and cleaner technologies to reduce emissions in the region. To mitigate these harmful impacts, we strongly recommend the evaluation of zero-emission vehicles, trucks, and locomotives for projects in the Portside Community. Transitioning to clean technologies aligns with the goals and strategies in Portside Community Emissions Reduction Plan.[2]

DEIR Emission Calculations

- Tables B10-B13 of the DEIR provide information regarding onsite emissions from stationary source equipment. On page 94 of the DEIR, it is assumed that there is a 98.7% vapor collection efficiency (based on New Source Performance Standard-Level Annual Leak Test). This would result in a 1.3% assumed fugitive losses. Also, on pages 128-129 of the DEIR, it is assumed that there is a 1% residual diesel left in the rail cars from previous loads (1 – 0.99 or 99% efficiency). However, the assumption that 99% of emissions are being controlled lacks a clear basis. Additionally, it is not evident how toxic air emissions from the fugitive losses and residual diesel fuel present in the rail cars are accounted for and assumed that they are being further reduced by an additional 99%, beyond the 98.7% control efficiency reported for the vapor collection system.
- The analysis of acute impacts from diesel combustion must include all speciated components of DPM. The SDAPCD has published emission factors for DPM[3].

[1] https://www.sdapcd.org/content/sdapcd/compliance/air-quality-complaints/nuisance-complaint-program.html
[2] https://www.sdapcd.org/content/dam/sdapcd/documents/capp/cerp/Portside-Environmental-Justice-CERP-July-2021.pdf
[3] https://www.sdapcd.org/content/dam/sdapcd/documents/permits/emissions-calculation/combustion-diesel-fired-engines-/APCD-Engine-DieselFired-600-BHP-Uncontrolled.pdf

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- The title above Table B-14 (*Operational Assumptions for Train Transport of Liquid Fuels*) should be labeled "Train Transport" rather than "Switching Activity".
- The emissions reported under Table B-17 (*Daily Emissions from Train Transport of Clean Fuels*), should be "0.017 lbs/hr" rather than the "0.002 lbs/hr".
- Table B-18 (*Annual Emissions from Train Transport of Clean Fuels*) reports emissions in lbs/yr, but labels them as "tpy".

Should you have any questions about these comments or APCD requirements please contact Supervising Air Resources Specialist, Eric Luther (858) 586-2893 or eric.luther@sdapcd.org.

Sincerely,

Eric Luther

Eric Luther
Supervising Air Resources Specialist