



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

SENT BY E-MAIL & USPS:
SB4EIR@conservation.ca.gov

March 13, 2015

Ms. Adele Lagomarsino
Department of Conservation
Division of Oil, Gas and Geothermal Resources
801 K Street, MS 18-00
Sacramento, CA 95814

Draft Environmental Impact Report (DEIR) for the Proposed Analysis of Oil and Gas Well Stimulation Treatments in California (SCH. NO. 2013112046)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

The DEIR provides information regarding potential environmental impacts associated with well stimulation treatments in California occurring at oil and gas wells that existed either prior to, or drilled after January 1, 2014. The SCAQMD staff recommends consideration of the following comments and recommendations related to the DEIR.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD 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 Jillian Wong, Program Supervisor CEQA Section, at (909) 396-3176, if you have any questions regarding the attached comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura". The signature is fluid and cursive.

Susan Nakamura
Director of Strategic Initiatives
Planning, Rule Development & Area Sources

Attachment
ODP150114-20
Control Number

SN:JW:EE:GM

1. Project Emissions and the State Implementation Plan (SIP)

On pages 10.3-27, 28, and 43, the Lead Agency has determined that under Impact AQ-1: Conflict with or Obstruct Implementation of an Air Quality Plan, the impacts are significant and unavoidable impact for all of California, except the South Coast Air Basin (SCAB). The Lead Agency reasons that SCAQMD Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers means that the emissions from these activities are included in the SCAQMD's Air Quality Management Plan (AQMP) and subsequently in the State Implementation Plans (SIP). However, as noted in the Draft EIR, SCAQMD Rule 1148.2 is a reporting rule only, and the emissions from the reported oil and gas well activities are not used in our SIP inventory development. SCAQMD Rule 1148.1 does affect oil and gas wells, however, the provisions generally apply to activities which occur after well stimulation activities. Thus, the conclusion that the emissions have been accounted for in the AQMP are not valid and the Lead Agency should provide further substantiation as to how this impact is brought to a less than significant level for projects within the SCAB.

2. Localized Significance Threshold Impacts

Starting on Page 10.3-36, the DEIR discusses Impact AQ-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations. The SCAQMD staff recommends evaluating localized air quality impacts from both criteria air pollutants as well as toxic air contaminants if the proposed project is located within one-quarter mile of sensitive receptors (residences, schools, playgrounds, child care facilities, athletic fields, long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, etc.) to ensure that any nearby sensitive receptors are not adversely affected by the construction or operation activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address:
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

3. Revision to Appendix D

The DEIR includes Appendix D – Guidelines and Environmental Checklist for Future Environmental Reviews and Clearances. This includes a checklist for determining impacts from future projects. Since the DEIR includes mitigation measures meant to reduce the individual project's impacts, SCAQMD staff recommends revising this appendix in the Final EIR to include mitigation measures included in other parts of the DEIR for future reference and incorporation into future projects as applicable.

4. Mitigation Measures

On Page 10.3-35, MM AQ-2b Reduce Emissions from Portable Equipment and Mobile Sources is directed to reduce construction and well stimulation equipment emissions in ozone non-attainment areas or construction equipment emissions of toxic air contaminants (TAC) including diesel particulate emissions (DPM) during construction activities. MM AQ-2b includes using power from the existing electrical grid and requiring all off-road diesel engines to use at a minimum Tier 2 or Tier 3 (with proper diesel particulate controls), or

better (Tier 4) California Emission Standards during construction. The SCAQMD staff recommends the following changes to MM AQ-2b:

“Potential strategies include relying on electricity from the distribution grid for power and from January 1, 2015 and onwards, requiring all off-road diesel engines are required to meet at a minimum the ~~Tier 1 or~~ Tier 3 (with proper diesel particulate controls), or better (Tier 4) California Emission Standards for Off-Road Compression-Ignition Engines as specified in the California Code of Regulations (CCR) Title 13, Division 3, Chapter 9, Article 4, Sec. 2423(b)(1). In addition, if not already supplied with a factory-equipped diesel particulate filter, all construction equipment shall be outfitted with a Verified Diesel Emissions Control Strategies (VDECS) devices certified by CARB. Any emissions control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 VDECS diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.” The SCAQMD staff also recommends that a date be specified when Tier 4 engines be required.

In addition to the strategies included in MM AQ-2c on page 10.3-36, the SCAQMD recommends the following additional measures, if feasible:

Recommended additions:

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity and resolution of issues related to PM10 generation.
- Recommend using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Replace ground cover in disturbed areas as quickly as possible; and
- Pave road and road shoulders.

Operations

5. In order to control fugitive dust during operations, the project activities may include the storage, handling, and transfer of bulk dry materials such as sand, gravel, and other dry additives used in the well stimulation treatment process. The SCAQMD staff recommends using the following dust control measures as mitigation for the storage, handling, and transfer of bulk dry materials such as sand, gravel, and other dry additives used in the well stimulation treatment process, as applicable and feasible: bag houses; enclosures, covers, and Flexible (FIBC) and Rigid (RIBC) Intermediate Bulk Containers.