

MEMORANDUM

To: Darcey Rosenblatt (Dudek)
From: Lora Granovsky (iLanco Environmental, LLC)
Date: February 19, 2019
cc: Lisa Plowman (RRM), Kara Wright (Dudek)
Subject: **Response to Preliminary BAAQMD Comments on the ROA**

This memorandum responds to BAAQMD's preliminary comments, regarding the VMT/Orcem ROA air quality and health risk assessment, which were communicated verbally to Lisa Plowman by David Vintze in February 2019. It is my opinion that these comments do not represent red flags in the air quality and health risk analysis and can be addressed during formal response to comments.

BAAQMD vs Ramboll Cancer Risk

BAAQMD calculated a cancer risk 13.8 in a million. My understanding is that BAAQMD analysis reflects emissions from onsite equipment and ships at berth. Dave Vintze noted that if mobile sources are included, the total cancer risk would likely exceed the 18.3 calculated by Ramboll. I actually believe that the BAAQMD analysis confirms Ramboll's results. Below is a table of cancer risk source contribution from Ramboll's ROA analysis. The table shows that onsite equipment alone accounts for 12.42 in a million and ship activity at berth accounts for another 3.79 in a million. Other emission sources account for only about 10% of overall cancer risk.

Source Type	MEISR Cancer Risk	Percent of Total
Onsite Equipment Exhaust	12.42	68%
Marine Activity, at berth	3.79	21%
Marine Activity, other	1.47	8%
Trucks	0.27	1%
Rail	0.26	1%
Onsite Material Handling Fugitives (including Main Stack)	0.05	0%
Total	18.25	100%

Source: Ramboll ROA Risk Contribution Analysis.xlsx 1/16/19

BAAQMD revised NSR Rule (Regulation 2)

Per Lisa's understanding of Dave Vintze's comment, BAAQMD's New Source Review (NSR) Regulation 2 was recently revised to limit projects with a cancer risk above 5 in a million. I have found no evidence of this in the BAAQMD rules and regulations. NSR has been revised but revisions have nothing to do with modifying the CEQA cancer risk threshold. Both the NSR requirements and the BAAQMD CEQA threshold remain at 10 in a million.

NSR does require projects which exceed 1 in a million cancer risk to implement Toxic Best Available Control Technology (TBACT). Such requirements would be addressed as part of the BAAQMD permitting process, which would place operating conditions on the permit that limit emissions or require TBACT; this is not a part of the CEQA process. CEQA does not require an exhaustive permitting analysis of project sources and CEQA analyses largely accept that proposed projects would comply with local rules and regulations, whether those be air quality or building codes or other rules and regulations. A project that

does not comply with BAAQMD rules would not receive a BAAQMD permit in the same way that a project that does not comply with building codes would not receive a building permit.

AB617

AB 617 directs the state to select communities that have a high cumulative exposure burden to air pollution. Once selected, these communities would work with local air districts on community emission reduction programs and/or air quality monitoring campaigns. The BAAQMD is implementing AB 617 efforts through their Community Health Protection Program. Vallejo is identified as a 'Year 2-5' area, meaning that in the next 2 to 5 years, the District looks to incorporate planning and/or community air monitoring. The planning is ongoing, and the list of affected communities was submitted to CARB in August 2018. Whereas communities designated 'Year 1' have had public meetings, workshops, etc., little else has been done regarding 'Year 2-5' communities to date. In many ways, this program is an extension of BAAQMD's existing CARE program, which is described in the air section under rules and regulations. This is an EJ issue.