

BOARD ATTACHMENT 3
Responses to San Luis Obispo County Health Commission Comments
Dated May 15, 2012

Comment #	Response
HC-1	<p>The Poly Aromatic Hydrocarbons (PAH) used in the vapor spaces above the crude oil and the fugitive emissions are PAH levels obtained for generic crude oil based on SCAQMD parameters. Until such time as actual Huasna Oil Field crude is available the actual PHA concentration cannot be known.</p> <p>Significant changes in vapor concentrations of BTEX would potentially necessitate remodeling the HRA in order to update the health risk levels. However, as stated in the FEIR, the major contributor to the health risk was from diesel engines. The PAH emissions from the crude oil were a very small driver in the health risk as shown in Appendix D. Even a tripling of the PHA levels in the crude would not significantly change the result of the health risk assessment.</p> <p>The proposed project would have a vapor recovery system, which serves to substantially reduce the level of PAH emissions to the environment.</p>
HC-2	<p>The volume of spills, including both crude oil and produced water, were assessed in section 4.9.4.3, where the entire volume of the connecting pipelines is assumed to be released, including both crude oil and produced water. Table 4.9.1 addresses spill scenarios that could have acute impacts to humans, resulting from fires or explosions.</p> <p>The assumptions used in the letter for a produced water spill from a pipeline going to an injection well are not accurate. As stated in the Project Description of the FEIR (page 2-36), the range of produced water used for injection would be 200 to 1,000 barrels per day. Also, a full break of this produced water pipeline would be detected within about 10 minutes due to the loss of pressure on the injection pumps due to the high discharge pressure of the pumps. This would result in a spill of about 77 barrels, which is less than the worst case pipeline spill of oil and produced water evaluated in the FEIR (112 barrels).</p>
HC-3	<p>The impacts of spills on biological resources are addressed in section 4.4 of the FEIR under impact BIO.7, which addresses a rupture or leak from any field equipment, crude oil or oily water.</p> <p>Impacts to groundwater are discussed in section 4.14, Water Resources, under impact WR.2, which identifies spills of crude oil or produced water that could result in impacts to creeks or shallow groundwater, resulting in degradation of water quality and contamination of groundwater. Impact WR.2 discusses that the produced water contains high levels of salts, metals, hydrocarbons and organic compounds, but does not specifically mention boron. The exact composition of the produced water was not known at the time the FEIR was prepared. The exact composition can only be determined once there is production from the proposed project.</p> <p>As shown in the site layout figures in Appendix A of the FEIR, the pipelines</p>

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	<p>between the Shipping Site and the Pad would be placed in a swale/pipeline corridor along the side of the access road. In the event of a spill from a pipeline the fluid would be contained in the swale. Mitigation Measure WR.2-2 requires the development of a Spill Prevention and Control and Countermeasure Plan (SCCP). In the event of a produced water spill this plan would require that the Applicant remove any affected soil, which would serve to remove any contaminants from the produced water that could be washed deeper into the ground via future rain events.</p>
HC-4	<p>Spills of blend oil would be smaller than the anticipated spills from the largest tank onsite, which would be the crude oil storage tank, and are therefore encompassed within the analysis. There are other tanks or vessels at the site that would contain hydrocarbons or produced water that are smaller than the crude oil tank. However, the EIR examined the largest spill size as a worst case assessment. As discussed in the Project Description (page 2-37) the blend oil would be lighter oil. The Applicant has not proposed to use diluent (i.e., a kerosene refined product) like that used at the Guadalupe Oil Field. At the Guadalupe Oil Field millions of gallons of diluent were used. The proposed project would use between 600 and 1,500 barrels of blend stock per month.</p> <p>The mitigation measure requiring a SPCCP and an Oil Spill Contingency Plan (OSCP) would serve to limit impacts to water quality and biological resources from a blend oil spill.</p>