

**4) Response to Follow-up to Questions from the Bay
Area Quality Management District**

From: [Henry Hilken](#)
To: [Woo, Winnie](#); [Cole, Doug](#)
Cc: [Jack Broadbent](#); [Jean Roggenkamp](#); [David Vintze](#); [Alison Kirk](#); [Phil Martien](#)
Subject: RE: Follow Up Questions on Coal's Public Health and/or Safety Impacts
Date: Monday, October 05, 2015 12:17:20 PM

Dear Doug,

Thank you for the opportunity to offer further comments on the transportation of coal into the Bay Area and its transfer to ships through the proposed Break Bulk Terminal (Project). Below, I have addressed questions concerning the Bay Area Air Quality Management District (BAAQMD or Air District) posed by the City of Oakland in the memo from Claudia Cappio, dated September 28, 2015.

Availability of Data on the Health Impacts of Coal

Through the Community Air Risk Evaluation (CARE) Program, the Air District has established that despite great strides in reducing air pollution throughout the region, some communities in the Bay Area still experience relatively higher pollution levels and corresponding health effects, compared to their counterparts in other parts of the Bay Area.

Air pollution levels of many pollutants are highest in communities in close proximity to pollution sources – such as near freeways, busy roadways, distribution centers, ports, and large industrial sources like petroleum refineries. This describes both the communities surrounding the Port of Richmond and the Port of Oakland. The Air District does not have readily available data on specific health impacts to Richmond residents of coal shipments in Richmond. However, we do know that Richmond is exposed to relatively high levels of air pollution and residents suffer the health effects of these elevated emissions due to multiple sources of air pollution in close proximity. Likewise, West Oakland residents, who already face elevated health risks due to their proximity to various pollution sources including the Port of Oakland, rail yards and associated facilities, interstate freeways, and other sources, could face increased risk if the Project was approved without proper mitigation measures.

Given time and resources, it would be possible to measure the coarse particulate matter (PM10) in the air that is attributed to the transportation of coal products. For example, after the South Coast Air Quality Management District passed Rule 1158, which requires trucks carrying coal to cover the materials to prevent fugitive emissions, South Coast did find decreased PM10 at selected schools sites along truck routes. You can read more about Rule 1158 and follow-up studies here:

<http://www.aqmd.gov/home/library/air-quality-data-studies/air-quality-monitoring-studies/rule-1158>

Air District staff believes, however, that previous air quality modeling and measurements amply demonstrate that the West Oakland community experiences higher exposure to air pollution, and associated health effects, compared to other parts of the region, and that continued efforts to minimize air pollution emissions are needed.

The Air District is Available to Assist the City

Air District staff is available to meet with City staff and assist in the evaluation of Terminal Logistics Solutions' proposed mitigation measures and discuss additional measures. As Air District staff stated at the Sept. 21 hearing, potential air quality emissions and impacts to public health from the proposed Project include fugitive dust and equipment engine emissions. Dust emissions can be reduced through aggressive containment of all aspects of material handling – rail cars, conveyers, storage piles, etc. To address engine emissions, the Air District encourages the City of Oakland to require that the Project

proponents commit to the cleanest engines available, including Tier III locomotive engines, electric-powered cranes, cleanest available cargo handling equipment, and shore power for bulk ships.

I look forward to our continued collaboration and working together to ensure that the Project is as health-protective as possible.

Air District staff is available to assist the City in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Planner, at (415) 749-5169 or akirk@baaqmd.gov.

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From: Woo, Winnie [mailto:WWoo@oaklandnet.com]
Sent: Tuesday, September 29, 2015 12:29 PM
Cc: Cole, Doug
Subject: Follow Up Questions on Coal's Public Health and/or Safety Impacts

Sending on behalf of Claudia Cappio.

Dear Interested Parties:

Thank you for the very informative oral and written evidence submitted to date as part of the City's September 21, 2015 Public Hearing on the public health and/or safety impacts and other impacts of the transportation, transloading, handling and/or export of coal products in/through the City of Oakland.

Although we are still reviewing the materials submitted before and during the hearing, we are requesting answers be provided to the attached list of questions, some of which are technical and/or legal in nature. Please provide responses **no later than Monday, October 5, 2015 at 4:00pm**. Please direct responses to **Douglas Cole, at dcole@oaklandnet.com**.

The attached letter, all responses received and the written materials submitted as part of the public hearing are (or will be) posted on the City's website at:

<http://www2.oaklandnet.com/Government/o/CityAdministration/d/NeighborhoodInvestment/OAK038485>

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Rule 1158 Studies of Air Quality Near Petroleum Coke, Coal and Sulfur Storage, Handling and Shipment Facilities.

In June 1999, the South Coast AQMD amended Rule 1158, which applies to the storage, handling, and shipment of petroleum coke, coal and sulfur. Amended Rule 1158 further reduced particulate emissions from these sources. Subsequently, California State legislation (AB 1775 -- Lowenthal) added a Health and Safety Code section (Section 40459) which calls for the AQMD to maintain a program of monitoring particulates within the Port of Los Angeles and the Port of Long Beach, and assess prevalent coke particulates and improvements in air quality.

To monitor the efficacy of the Rule and address legislative requirements, the AQMD initiated a series of "Rule 1158 Follow-Up Studies". This page contains reports of a series of ongoing studies of the particulate matter and elemental carbon concentrations measured in the greater Long Beach/Wilmington area. The studies are each about 20 to 30 pages in length, and they can be downloaded by clicking on the appropriate title below.

[Rule 1158 Follow-up Study #12 and #13](#) (Sampling Conducted November 2005-February 2006 and December 2006 - March 2007))

(PDF, 2.58MB) (29 pages)

[Rule 1158 Follow-Up Study #11](#) (Sampling Conducted October 2004-December 2004)

(PDF, 4.7MB) (32 pages)

[Rule 1158 Follow-Up Study #10](#) (Sampling Conducted May 2004-June 2004)

(PDF, 4.9MB) (30 pages)

[Rule 1158 Follow-Up Study #9](#) (Sampling Conducted October 2003-November 2003)

(PDF, 4.7MB) (32 pages)

[Rule 1158 Follow-Up Study #8](#) (Sampling Conducted May 2003-June 2003)

(PDF, 4.1MB) (27 pages)

[Rule 1158 Follow-Up Study #7](#) (Sampling Conducted October 2002-December 2002)
(PDF, 3.8MB) (26 pages)

[Rule 1158 Follow-Up Study #6](#) (Sampling Conducted May 2002-June 2002)
(PDF, 4.0MB) (24 pages)

[Rule 1158 Follow-Up Study #5](#) (Sampling Conducted November 2001-January 2002)
(PDF, 4.0MB) (25 pages)

[Rule 1158 Follow-Up Study #4](#) (Sampling Conducted May and June 2001)
(PDF, 4.0MB) (25 pages)

[Rule 1158 Follow-Up Study #3](#) (Sampling Conducted November and December, 2000)
(PDF, 4.0MB) (26 pages)

[Rule 1158 Follow-Up Study #2](#) (Sampling Conducted May and June, 2000)
(PDF, 216kb) (19 pages)

[Rule 1158 Follow-Up Study #1](#)(Sampling Conducted November and December 1999)
(PDF, 216kb) (17 pages)

[\(Study #1 Graphs and Figures\)](#)

(PDF, 34kb) (5 pages)