

April 27, 2017

Wayne Nastri, Executive Officer,
South Coast Air Quality Management District (AQMD)

Re: New evidence from AQMD / Swedish Study shows Tesoro LARIC emissions drastically underestimated, EIR & Title V must go back to Re-Draft

Dear Mr. Nastri,

We write to follow-up on our request on the Draft EIR for the Tesoro Refinery expansion project. Recent findings by your own agency provide significant new evidence that warrant recirculation of the DEIR.

The April 11th publication of the full report on the joint Swedish /AQMD study made details available showing South Coast oil refinery emissions are drastically underestimated. In particular, the study shows that Tesoro grossly underreported emissions– with **43 times the benzene emissions** (cancer-causing), and **6.4 times the VOC emissions** compared to the District inventory.¹ Storage tank emissions were found to be especially significant, which is extremely disconcerting given Tesoro’s plans to almost double crude oil storage capacity.

These findings reveal not only that existing burdens for Wilmington/Carson/W. Long Beach communities are underestimated, but also that projected **increases** of emissions due to the Tesoro merger and expansion are severely underestimated in the draft EIR and Title V permit analyses.

We applaud the District for jointly carrying out this ground-breaking study, and we urge you to now use these new findings and uphold responsibilities to correct the inaccuracies and deficiencies in the environmental documents. The communities’ request that the massive Tesoro LARIC is not finalized before emissions are re-assessed and project deficiencies are fixed is very reasonable. **We ask that you re-assess the Tesoro baseline and LARIC increases, and recirculate the EIR as a Draft, incorporating the new study’s data.** This will be an extremely important step that will show the AQMD’s commitment to present accurate information to the community and decision-makers, and will demonstrate the agency’s commitment to equity and its Environmental Justice principles. Please let us know your response.

All the undersigned organizations and individuals urge these actions.

(Regarding any questions, please contact Bahram Fazeli, CBE, Research and Policy Director, 323-826-9771, x 100, bfazeli@cbeal.org.)

¹ *Emission Measurements of VOCs, NO2 and SO2 from the Refineries in the South Coast Air Basin Using Solar Occultation Flux and Other Optical Remote Sensing Methods*, Final Report, FluxSense Inc, 11 April 2017, Johan Mellqvist et al; Table 43, p. 94, Refinery A (Tesoro Carson). The study also states: “In our experience, tank emissions contribute approximately 2/3 of the total refinery emissions (Kihlman 2005).” p. 94.

Sincerely,

Alicia Rivera, Wilmington Community Organizer, Julia May, Senior Scientist, Bahram Fazeli, Research and Policy Director, and Gladys Limon, Staff Attorney, **Communities for a Better Environment (CBE)**

Adrian Martinez, Staff Attorney and Yana Garcia, Associate Attorney, **Earthjustice**

Taylor Thomas, Research and Policy Analyst, **East Yard for Environmental Justice**

Jesse N Marquez, Executive Director, **Coalition For A Safe Environment**

Jack Eidt, Cofounder, **SoCal 350 Climate Action and Tar Sands Action SoCal**

Sherry Anne Lear, Co-Organizer, and Joe Galliani, Founding Organizer, **South Bay Los Angeles 350 Climate Action Group**

Alice Stevens, **Long Beach 350**

David Pettit, Senior Attorney, **Natural Resources Defense Council**

Christian L. Guzman, Sustainability Chair, **Central San Pedro Neighborhood Council**

Evan Gillespie, Director, My Generation Program, **Sierra Club**

Anabell Romero Chavez, Board Member, **Wilmington Improvement Network**

Gisele Fong, Ph.D., Executive Director, **EndOil / Communities for Clean Ports**, Chair, **Building Healthy Communities: Long Beach, Environmental Health Work Group**

Stella Ursua, President, **Green Education, Inc.**

Dean Toji, Ph.D., Chair, **Asian Pacific Planning and Policy Council (A3PCON)**, **Environmental Justice Committee**

Maya Golden-Krasner, Senior Attorney, Climate Law Institute, **Center for Biological Diversity (CBD)**

Steve Colman, Executive Director, **Century Villages at Cabrillo**

David Braun, Director, **Rootskeeper**

cc.

Veera Tyagi, Principal Deputy District Counsel, Jillian Wong, Planning & Rules Manager, and Danny Luong, Sr. Enforcement Manager, AQMD

Mayor Garcetti, City of Los Angeles, Mayor Robles, City of Carson, Mayor Garcia, City of Long Beach

Matt Petersen, Chief Sustainability Officer, City of Los Angeles, Uduak Ntuk, Petroleum Administrator, City of Los Angeles