
Central Coast Regional Water Quality Control Board

December 17, 2021

Mr. Gary Kupp
Contra Costa County
Department of Conservation and Development
30 Muir Road
Martinez, CA 94553
Email: gary.kupp@dcd.cccounty.us

Sent via Electronic Mail only

Governor's Office of Planning & Research

Dec 17 2021

STATE CLEARINGHOUSE

Dear Mr. Kupp:

SITE CLEANUP PROGRAM: PHILLIPS 66 SANTA MARIA REFINERY, 2555 WILLOW ROAD, ARROYO GRANDE, SAN LUIS OBISPO COUNTY – REVIEW AND COMMENT ON PHILLIPS 66'S RODEO RENEWED PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT (STATE CLEARINGHOUSE NO. 2020120330 COUNTY FILE NO. CDLP20-2040)

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) has reviewed Cardno, Inc.'s Draft Environmental Impact Report (Draft EIR)¹ dated October 2021 that was submitted to the State Clearinghouse and Contra Costa County. As described in the Draft EIR, Phillips 66 Company proposes to repurpose the Rodeo Refinery to no longer process crude oil. Therefore, other sites owned and operated by Phillips 66 Company located throughout California would be affected, including the Santa Maria Refinery in San Luis Obispo County and two of the four pipelines (i.e., Lines 300 and 400) that transport crude oil and/or processed petroleum distillate from the Santa Maria Refinery in San Luis Obispo County to the Rodeo Refinery in Contra Costa County. As noted in the Draft EIR, Phillips 66 Company will obtain Central Coast Water Board stormwater and waste discharge permits for demolition.

The Central Coast Water Board is only providing comments on the Draft EIR related to the decommissioning of infrastructure within the Central Coast Region (i.e. San Luis Obispo and Santa Barbara counties). Based on our review of the Draft EIR, the Central Coast Water Board has the following comments for consideration:

1. Prior to the County of San Luis Obispo Planning and Building issuing demolition permits for the Santa Maria Refinery, the Central Coast Water Board would like to review and comment on Phillips 66 Company's proposed handling and disposal of the demolition-derived waste materials.

¹ The Draft EIR can be found at the following link: <https://ceganet.opr.ca.gov/Project/2020120330>

2. Prior to the County of San Luis Obispo Planning and Building Department and Santa Barbara County Planning Department issuing permits, the Central Coast Water Board would like to review and comment on Phillips 66 Company's plans for handling and disposal of the material removed from the pipelines located in San Luis Obispo and Santa Barbara counties.
3. The Santa Maria Refinery is an active cleanup case in the Central Coast Water Board's Site Cleanup Program². Contra Costa County and the County of San Luis Obispo should be aware that Phillips 66 Company has several ongoing environmental projects at the Santa Maria refinery:
 - Northern Impacted Waste Site – excavation and offsite disposal of waste materials from this area on the refinery is expected to resume and be completed in 2022.
 - Slop Oil Line Release Area – installation of a groundwater extraction and treatment system in this area is scheduled for January 2022. The remediation system infrastructure and associated utilities necessary to operate the system will need to be protected from heavy equipment during decommissioning activities. In addition, Phillips 66 plans to operate the remediation system for several years beyond the proposed project.
 - Per-and polyfluoralkyl substances (PFAS) investigation³ – collection of groundwater, wastewater treatment plant influent and effluent, and stormwater samples from various areas on the refinery property is expected in first quarter 2022. Phillips 66 Company's consultants will sample and analyze the various media for PFAS compounds then prepare a summary report with recommendations if additional investigation is needed.

Thank you for the opportunity to comment on the Draft EIR. If you have any questions regarding this comment letter, please contact **Amber Sellinger at (805) 549-3866** or Sheila Soderberg at (805) 549-3592 (email addresses are below).

Sincerely,

for Matthew T. Keeling
Executive Officer

cc's on next page

² Additional information on the Site Cleanup Program cases can be found on GeoTracker at: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL203121248

³The PFAS Work Plan can be found in GeoTracker at: <https://geotracker.waterboards.ca.gov/?url=qysvb>

cc via email:

State Clearinghouse, Office of Planning and Research, state.clearinghouse@opr.ca.gov
Kristen Kopp, Phillips 66 Company, Kristen.M.Kopp@p66.com
Donald Bowman, Phillips 66 Company, Donald.G.Bowman@p66.com
Jim Anderson, Phillips 66 Company, James.O.Anderson@p66.com
Sean Hunt, Phillips 66 Company, sean.h.hunt@p66.com
Steve McMasters, County of San Luis Obispo, smcmasters@co.slo.ca.us
Lacey Minnick, County of San Luis Obispo, lminnick@co.slo.ca.us
Kevin Tomita, Trihydro Corporation, KTomita@trihydro.com
Katherine Swords, Trihydro Corporation, kswords@trihydro.com
Angela Schroeter, Central Coast Water Board, Angela.Schroeter@waterboards.ca.gov
Greg Bishop, Central Coast Water Board, Greg.Bishop@waterboards.ca.gov
Ryan Lodge, Central Coast Water Board, Ryan.Lodge@waterboards.ca.gov
Phil Hammer, Central Coast Water Board, Phillip.Hammer@waterboards.ca.gov
Arwen Wyatt-Mair, Central Coast Water Board, Arwen.WyattMair@waterboards.ca.gov
Sheila Soderberg, Central Coast Water Board, Sheila.Soderberg@waterboards.ca.gov
Amber Sellinger, Central Coast Water Board, Amber.Sellinger@waterboards.ca.gov

GeoTracker SCP files: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL203121248

Water Board internal file: r:\rb3\shared\scp\sites\slo co\arroyo grande\2555 willow-sm refinery\correspondence\12-17-2021_scp_ph66_smrefinery_eir.docx

BizFlow Task: M30000 Site Cleanup Program DARTS: 2031200