

To: Richmond-North Richmond-San Pablo Community Path to Clean Air (PTCA) Community Steering Committee (CSC)

From: Bay Area Air Quality Management District staff

Date: March 15, 2024

Re: Draft Final PTCA Community Emissions Reduction Plan - Summary of changes made to December 2023 Draft PTCA Community Emissions Reduction Plan

The following memo is a summary of changes that Air District staff have made to the December 2023 Draft PTCA Community Emissions Reduction Plan (Draft PTCA Plan) to create the Draft Final PTCA Community Emissions Reduction Plan (Draft Final PTCA Plan).

Air District staff made these non-substantive changes to the Draft Final PTCA Plan at the direction of the CSC at the [February 26 meeting](#). These non-substantive changes are in response to comments from the public, from Air District staff and from a technical editor. Changes itemized below include word substitutions and revisions, new figures, and edits to strategy actions. Minor grammatical changes and clerical corrections are not itemized in this memo.

Cover Page

1. Changed cover image and publication date.

Executive Summary

1. Updated Executive Summary reference to PTCA Plan to (new text in red): Draft **Final** PTCA Plan.

Chapter 1

1. Page 8 Text describing Chapter 4 reworded for clarity (new text in red): Chapter 4 describes the PTCA community, including the long history of **sources generating pollution that impacts the community, such as** industrial, port-related, transportation, and other sources.

Chapter 2

N/A

Chapter 3

N/A

Chapter 4

N/A

Chapter 5

1. Page 23 Spelled out “U.S. Environmental Protection Agency (U.S. EPA)” instead of using an acronym.

2. Page 28 Added text (in red) for clarity: EPA is currently considering lowering (**in this case**, strengthening) the existing NAAQS for annual PM_{2.5} to a level between 9 and 10 micrograms per meter cubed (µg/m³), and the annual average PM_{2.5} design value for the San Pablo air monitoring site may be above the new standard.
3. Page 41 Added map of permitted sources and roadways (new Figure 5-17) and made updates to figure sequence numbering.

Chapter 6

1. Page 62 Added a note to the discussion of permitted sources in Chapter 6 to refer back to the new permitted source map (Figure 5-17).
2. Page 65 and elsewhere throughout Chapter 6, added “area” after “PTCA” to clarify reference to the “Path to Clean Air area”.
3. Page 70 Added complete legend to Figure 6-9 and updated figure title.

Chapter 7

1. Page 85 and throughout plan updated reference to “Gold Bond (formerly New NGC, Inc.)”.
2. Page 100 Updated Fuel Refining action FR 3.3 to remove reference to USW Local 5 (new text in red): **Seek to build** a strong collaborative relationship with operators and **Union** Health and Safety representatives.
3. Page 101 Deleted words “click here to enter text”.
4. Page 124 Updated Mobile Strategy 2 to be clearer about the air quality focus of the strategy (new text in red): “Prioritize **Air Quality Benefits** of Traffic Calming and Other Safety Improvements on Local Streets and Freeways”.

Chapter 8

1. Page 140 Clarified sentence by adding text (in red): **CARB** staff is currently working with the air districts to revise the CAP Guidelines.

Chapter 9

N/A

Glossary

N/A

Appendix A

1. Page A-15 Corrected name of Gold Bond to “Gold Bond Building Products, LLC (formerly New NGC, Inc.)”.
2. Page A-31 Updated reference to Title VI in Fuel Refining Action FR 1.1 adding Gov. Code section 11135.
3. Page A-40 Updated reference to Fuel Refining Action FR 2.6 to add rule names to Rules 12-11 and Rule 12-12 for readability.

4. Page A-41 Edited Fuel Refining Action 2.6 by adding text (in red): **Seek to** work with USW Health and Safety reps to develop ideas.
5. Page A-43 Edited Fuel Refining Action FR 3.1 to provide more flexibility in reference to union [only edited bullets are presented below; new text in red, deleted text in strikethrough]:

Action name/brief description	prioritized consultation with USW Local 5 Health and Safety Representatives and Operators for Chevron investigations (in addition to Environmental staff and office-based staff) ○ Seek to work with USW Local 5 Health and Safety Representatives to find a process of reporting and investigating that is conducive to their workflow • evidence-based decision-making involving environmental impacts, public and worker health impacts, and other risk factors • additional scrutiny over self-reported information from Chevron by seeking consultation with USW Local 5 workers
Partners in action implementation	Union USW Local 5 Health and Safety representatives and operators

6. Page A-44 through A-45 Edited Fuel Refining Action FR 3.3 to provide more flexibility in reference to unions [only edited bullets are presented below; new text in red, deleted text in strikethrough]

Action name/brief description	Seek to establish and build a strong collaborative relationship with operators and Union USW Health and Safety representatives • Create an annual outreach campaign to inform Union USW health and safety representatives and operators about mechanisms for communicating and collaborating with the Air District, including sharing information about ○ relevant Air District staff contacts ○ use of the Complaints system, and ○ protections for complainants • Work to establish a liaison role, with a dedicated representative from both the Air District and from within the Union (i.e., USW) USW Health and Safety representatives ○ Conduct a monthly meeting to review health and safety concerns ○ When necessary, Air District will facilitate consultation from outside agencies and community partners • All inspections, investigations, and audits will include when feasible: ○ The presence of Union (e.g., USW) USW Health and Safety representatives and/or explore identifying a relevant Union liaison USW Liaison.
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	○ An interview with workers, Union USW Health and Safety representatives, and/or explore relevant Union the USW liaison before and/or after inspections
Related existing Program, Policy, or Initiative	USW Union (e.g., USW) Health and Safety Program
Partners in action implementation	Union Health and Safety workers (e.g., USW Local 5) USW
Key stakeholders to engage in action implementation	CSC; Union (e.g., USW) USW

7. Page A-47 Edited Fuel Refining Action FR 3.6 reference to Title VI by adding reference to Gov. Code section 11135 and removing reference to USW, replacing it with “Union (e.g., USW)”. Updated “Partners in action implementation” section to remove reference to USW replacing with “Proposed partners: Union (i.e., USW Local 5)...”.
8. Page A-136 Strategy 2 updated name (new text in red): Prioritize **Air Quality Benefits** of Traffic Calming and Other Safety Improvements on Local Streets and Freeways – Actions.

Appendix B

N/A

Appendix C

N/A

Appendix D

N/A

Appendix E

N/A

Appendix F

N/A

Appendix G

N/A

Appendix H

1. Page H-9 Added a table that highlights the presentations that took place over this seven-month period, led by steering committee members.
2. Page H-11 Added a description of the public comment period for Draft PTCA Plan, the public workshop held to review the Draft PTCA Plan and added the public comment documents.

Appendix I

N/A

Appendix J

N/A

Appendix K

N/A

Please contact Diana Ruiz at druiz@baaqmd.gov or Wendy Goodfriend at wgoodfriend@baaqmd.gov if you have any questions about changes to the Draft Final PTCA Plan.