

From: [Mary Elizabeth](#)
To: [Rodriguez, Melanie](#)
Cc: [Mother Lode Chapter, Delta-Sierra Group ExCom](#)
Subject: Port Commission Comments 4.20.2026
Date: Monday, April 20, 2026 2:40:45 PM
Attachments: [California Ammonia Port of Stockton violation August 2025.pdf](#)

CAUTION: This email originated from outside the Port. Please exercise caution.

Greetings,

I have prepared some comments for your consideration on matters off the agenda and on the agenda.

Non-agenda Comments

While doing research on another matter, I came across an EPA Press Release regarding settlement of violations observed in 2022 during an inspection which San Joaquin County Environmental Health (CUPA) attended but according to a public records act request the San Joaquin Valley Air Pollution Control District did not. The Port Outreach Committee should have been informed of these violations and what the lease holder (?) did in response. These were serious violations relating to safety which is of a concern to the community surrounding the Port of Stockton. I ask that there be a community meeting to discuss these issues and so that the company can explain in detail what was done to comply with US Title 5 requirements. I have attached the press release for your consideration.

Item 4.B – Conflict of Interest and Ethics

Thank you for the timely update and considerations regarding designated filers. I ask that there be made a map that is readily available to show : Investments and business positions in any business entity located within, doing business or planning to do business within the sphere of influence of the Stockton Port District or within two (2) miles of any property owned or used by the Stockton Port District.”

Also, when the term Port employees is used does the term also include the Port Commissioners?

Item 4.C CEQA Exemption

Harmful algal blooms are of interest to the residents of Stockton and discussed when the Port is presenting water quality data to the Port Outreach Committee

but not about this project working with UC Merced. I have put in a PRA for the executed contract and am wondering about whether or not the planned dredging for 1.9 million is in excess to the routine dredging and if the Port will have a webpage update that includes the periodic evaluations that are prepared and include data in the Port newsletter.

PREVIOUS ACTIONS Resolution #8548: Approved on December 16, 2024 authorized the Port Director to accept the Federal Contract for Solicitation #CSO-HAB-2024-0010 for the Harmful Algal Bloom Project for an amount not-to-exceed \$2,640,200.

PROJECT OVERVIEW Authorized by the Water Resources Development Act of 2020, the ERDC Environmental Laboratory sought scalable technologies to prevent and manage freshwater Harmful Algal Blooms (HABs). In response, the Port of Stockton has secured approval for a project targeting an 8-acre area of the Stockton Waterfront known for high concentrations of Microcystis seed stock and internal phosphorus loading. The initiative aims to reduce HAB intensity by using mechanical clamshell dredging to remove contaminated sediment, thereby altering the water's biogeochemistry and eliminating the dormant cyanobacteria cells that fuel seasonal blooms. The project is estimated to cost \$2,694,200, with the federal contract covering the entire amount.

Robertson-Bryan Inc. will serve as the technical lead alongside partners such as UC Merced and the California Department of Water Resources, while the Port of Stockton will manage the dredging operations, valued at approximately \$1.9 million. Because the majority of the funding flows through the Port, the Port will serve as the primary entity responsible for executing the contract and overseeing the localized efforts to improve water quality.

Item 6 Electric Rate Schedule

Information about the tenant's electrical consumption and their determination of demand would be important to consider when the Port's clean air plan is updated to include those indirect emissions related to the mix of energy that the Port of Stockton procures.

Thank you for your efforts to reduce emission releases that harm the community.

Sincerely,

Mary Elizabeth, M.S., R.E.H.S.



EPA Requires Chemical Safety Improvements at Stockton Facility

August 19, 2025

Contact Information

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STOCKTON, Calif. (Aug. 19, 2025) — Today, U.S. Environmental Protection Agency (EPA) announced a settlement with the California Ammonia Company (CALAMCO) for claims of violations of the Clean Air Act (CAA). CALAMCO stores and distributes anhydrous ammonia for various agricultural operations to produce fertilizers. The facility also manufactures, stores, and distributes smaller quantities of aqueous ammonia to agricultural producers. Under the terms of the settlement, CALAMCO agreed to undertake significant chemical safety improvements and pay a penalty of \$460,465.

“Protecting communities, local firefighters and other emergency responders from chemical accidents is a top priority for EPA,” **said EPA Region 9 Administrator Josh F.W. Cook.** “Anhydrous ammonia is an extremely dangerous substance and needs to be dealt with as such. It is of the utmost importance that facilities like this one follow the law and ensure safety measures are in place.”

Anhydrous ammonia is an effective refrigerant, but can cause serious, often irreversible health effects when released. In addition to potential impacts from inhalation or skin contact, the chemical is highly flammable.

EPA inspected CALAMCO’s Stockton facility in March 2022, and determined there were numerous violations of the CAA Section 112(r), also called the Risk Management Program (RMP), and the General Duty Clause, including:

- Failure to test and maintain critical ammonia refrigeration equipment, necessary to both prevent and quickly respond to incidents.
- Failure to properly label ammonia refrigeration equipment and document the equipment complied with industry safety standards, crucial to the safe operation of the equipment and to reducing the risk of ammonia release.
- Failure to provide training for employees on proper operating procedures, a key component to maintaining safe operation of the equipment.
- Failure to conduct an adequate process hazard analysis, a requirement designed to analyze and reduce the risks associated with the ammonia refrigeration system.

An underestimate of the quantity of ammonia that could be released in an incident and failure to document the population that could be affected by such an incident. These measures are necessary for first responders and community members to adequately prepare for potential accidents.

CALAMCO has been cooperative in working to significantly improve its RMP throughout 2023 and 2024 as part of this settlement. The company has corrected equipment deficiencies, properly labeled ammonia processing equipment, updated its operating procedures, and performed a new process hazard analysis, among other improvements.

For more information on reporting possible violations of environmental laws and regulations visit EPA's enforcement reporting <<https://epa.gov/enforcement/report-environmental-violation-general-information>> website.

Learn about EPA's Pacific Southwest Region <<https://epa.gov/pacific-southwest-media-center>>.

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Last updated on September 25, 2025