

*Benicians for a Safe &
Healthy Community*



*P.O. Box 622
Benicia, CA 94510*

July 13, 2020

Jack Broadbent
Air Pollution Control Officer
Bay Area Air Quality Management District
375 Beale Street
San Francisco, CA 94105

Attn: David Joe

Re: Response to May 28, 2020 Draft Amendments for BAAQMD Regulation 6-5
Particulate Matter Emissions from Fluidized Catalytic Cracking Units (FCCU's)

Mr. Broadbent:

Benicians for a Safe and Healthy Community (“BHSC”) is a grass roots organization composed of residents in Benicia who came together to successfully fight against Valero Benicia’s plans to build a crude-by-rail terminal at its Benicia refinery. Several members are veterans of prior efforts to require Valero to clean up its operation in Benicia.

From the community perspective, the health of our families along the refinery corridor and the viability of the planet’s survival must be your priority as you consider this policy.

We know that Valero is the only refinery in the Bay Area equipped with a partial wet scrubber and had a considerable impact, while far from where we would like to see them, on reducing toxic emissions from the refinery. BHSC believes Rule 6-5 is the vehicle for BAAQMD to extend the benefits of wet scrubbers and other technology to the other Bay Area refineries under the Best Available Retrofit Control Technology requirements under AB-617, regardless of costs.

BHSC also supports the demand for source specific monitoring results to be taken and made public, particularly on the condensable PM portions of the emissions which BAAQMD has not even initiated. All of this must be done for an informed public decision on Rule 6-5.

BAAQMD’s draft Rule 6-5 must be revised such that the Air District conducts the source tests measuring PM emissions itself. Reliance on refinery self-monitoring should be prohibited. Enforceable and effective PM standards must be based on measurements by transparent publicly controlled agencies, not polluters. This is akin to a police internal affairs division being asked to provide justice for victims of police abuse.

BHSC believes the draft proposal is far from sufficient to provide the protective measures required to stop the generations of disease and death suffered by our communities as a result of exposure to these controllable poisons. It long past due for BAAQMD to fulfill its mission by adopting the strongest protective measure to ensure the maximum benefit to the public's health.

Sincerely,

A handwritten signature in cursive script that reads "Katherine Black". The signature is written in black ink and is positioned above the printed name and title.

Katherine Black
Steering Committee Chair
Benicians for a Safe and
Healthy Community