

From: [REDACTED]
To: [David Joe](#)
Subject: Re: Zara Negron's Comments on BAAQMD Draft Rule 6-5 (Oil Refinery FCCUs)- Cap enforcement on particulate emissions produced by refineries .
Date: Thursday, February 11, 2021 8:26:06 PM

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February 11, 2021
David Joe
Bay Area Quality Management District (BAAQMD)
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**Re: Zara Negron's Comments on BAAQMD Draft Rule 6-5 (Oil Refinery FCCUs)-
Cap enforcement on particulate emissions produced by refineries.**

Dear Mr. Joe,

As a concerned member of the public, I appreciate this opportunity to provide comments regarding the Bay Area Quality Management District (BAAQMD) proposed amendment on Regulation 6, Rule 5: Particulate Emissions from Petroleum Refinery Fluidized Catalytic Cracking Units (Regulations 6-5).

Bay Area oil refineries are quite literally poisoning the air with lethal Particulate Matter (PM) emissions and Hazardous Air pollutants (HAPs). Numerous studies support that PM10, PM 2.5, and Hazardous Air pollutants (HAPs) are detrimental to the respiratory and cardiovascular systems. As a concerned citizen, I am calling upon the Bay Area Quality Management District (BAAQMD) to fulfill its duty of creating a healthy breathing environment for every Bay Area resident. Adoption of amendments to Draft Rule 6-5 that support stricter controls of air pollutants from FCCUs (Fluid Catalytic Cracking Units) or ("Cat Crackers") at Bay Area oil refineries would prioritize the protection of public health ahead of refinery profits. Specifically, enforcing a cap on particulate emissions produced by refineries.

Enforcing a cap on emissions produced by Bay Area oil refineries would grant refineries the autonomy to use whatever technology is best practice to meeting an emission cap. Furthermore, enforcing a cap would ensure the protection of public health, advance state climate goals, and reduce greenhouse gas (GHG) emissions. Nevertheless, the adaption of the more stringent ruling and regulation of refinery FCCUs (Fluid Catalytic Cracking Units) is vital to pollution prevention to minimize lethal Particulate Matter (PM) emissions produced by refineries.

In the Bay Area, PM2.5 alone causes thousands of deaths per year. Chevron's FCCU is the largest source of PM 2.5 in the city of Richmond. It pains me, as a Bay Area native, to stand witness to communities of color being disproportionately targeted by environmental pollution. The BAAQMD Appendix A.1 Exposure and Health Equity Assessment for Rule 6-5 (Draft) demonstrates the disproportional risk impact burdened by African-Americans and Hispanic/Latino groups. These frontline communities located around the refineries have the highest concentration burden of particulate matter. Poor air quality only exacerbates the chronic respiratory conditions that increase the risk for COVID-19 fatality. Further reductions of particulate matter emissions are needed to ensure progress towards the attainment of the standards and to achieve further clean air and regional and local public health benefits. Environmental justice is urgently needed to protect frontline communities from the continuous harm of industries built on environmental pollution.

Furthermore, as a third option, this letter supports the installation of industry standard "wet scrubbers" on FCCUs rather than electrostatic precipitators (ESPs). Wet scrubbers are far more effective, removing more than 90% of PM, where ESPs are 30% less effective and pose a fire hazard.

Thank you for your time and consideration of my recommendations. Please contact me with any further questions.

With Sincere regards,

Zara Negrón
Masters candidate
The University of San Francisco

