

From: [REDACTED]
To: [David Joe](#)
Cc: [REDACTED]
Subject: CITIZEN IN FAVOR OF OPTION B
Date: Thursday, February 11, 2021 7:14:58 PM

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CITIZEN IN FAVOR OF OPTION B (0.010 gr/dscf):
For the Regulation 6 Rule 5: Particulate Emissions from Refinery Fluidized Catalytic
Cracking Units 2021 Amendment

Dear Mr. Joe,

I'm writing to you in hopes that you will consider my opinion when making your decision to implement either Option A or Option B for the regulation of fluidized catalytic cracking units. This was the first time I had ever sat in on a public workshop for air regulations let alone for environmental regulations at all. I attended this meeting as part of an assignment for school as I am currently pursuing my Master of Science degree in Environmental Management at the University of San Francisco. During the day, I am an Environmental Analyst Subject Matter Expert who provides guidance to a private company on water regulations at the federal, state, and local levels. Air permitting is not something I'm experienced with. However, even I can see that Option B is the better choice. There are three points I would like to make in this letter.

1. The community's voice matters
2. The health effects of particulate matter need to drive this decision
3. Racial inequality can be addressed here

While I don't have much technical experience in air regulations, the valuable works the BAAQMD has created and the expert opinions given during the workshop have helped me to form an opinion on this topic and would like to share it with you now.

Like I said, this is my first time attending one of these meetings. I was completely in awe by how involved the community has become in this matter and I was inspired by these citizen activists who truly care about their communities and families. I also saw something very

jarring. If one were to summarize this meeting, a general summary would be: those in favor of Option A are solely employed by the refineries impacted by this new regulation and those in favor of Option B are literally everyone else within the community. What does this tell you? In my opinion, it tells you there shouldn't even be a question about which option to choose. If all regulations could be determined by those causing the need for the regulation, there would be no regulations. You are the biggest barrier between clean and healthy air in the Bay Area. If not you, then who?

Furthermore, the community voices were not just laypeople. There were countless nurses who spoke, who truly understand the negative effects these refineries have in this area and these nurses are clearly tired of seeing patient after patient struggling with asthma and other lung related illnesses, due to the poor air quality. Aside from nurses there many other members of the community, scientists, activists, community leaders, all with important stakes in the game.

The employees of the oil refineries made some valid points such as, the increased costs could result in the termination of employees, the data from the BAAQMD is old and had the BAAQMD had newer data they would have seen air emissions had already been reduced considerably in the last two years, these wet scrubbers would increase water use and result in harm to the environment that way, and that these wet scrubbers are inconsistently effective at removing particulate matter. The rebuttals for these arguments are as follows (respectively): more than likely the refineries would put the cost on the consumer which would only raise gas prices 2 cents a gallon; even if emissions have already been reduced the last few years these are single sources of emissions, if we could reduce them, why wouldn't we; the wet scrubbers recycle water so saying that they would increase water use by a substantial amount is misleading; lastly, we know that wet scrubbers are more effective than other methods that are currently required. As evidenced by the BAAQMD Draft Amendments to 6-5 Report, the Valero Facility has only 81 tons of PM10 and PM 2.5 per year which is over 3 times less than that of Chevron and PBF Facilities.

There are several important facts and figures which have clearly swayed the public towards Option B. Option B is the more stringent environmental regulation for fluidized catalytic cracking units. As mentioned by your BAAQMD employees, the catalytic cracking units comprise almost 3% of the entire PM air pollution in the bay area. That is huge. This pollution is resulting in a higher rate of negative health effects. Figure 1 presented at the meeting and in Appendix A.1 Exposure and Health Equity Assessment for Rule 6-5 (DRAFT) shows how poor the air quality has become around the Chevron and PBF refineries. In Table ES.1 of "Appendix A.2:

Modeling Fine Particulate Matter Emissions from the Chevron Richmond Refinery: An Air Quality Health Impact Analysis (Interim DRAFT Report – Version 1)," it clearly shows that Option B, on average, lowers the risk to Cardiovascular problems, Restricted Activity, Lost

Work, Asthma, Respiratory Illness, and Mortality by 10% when compared to Option A.

Additionally, as mentioned in the meeting, the areas that are being negatively affected primarily are comprised of disadvantaged minorities such as African Americans and Latinos. This isn't just an environmental issue, it's a racial issue. Figure 5b in Appendix A.1 Exposure and Health Equity Assessment for Rule 6-5 (DRAFT) shows African Americans and Latino's have the most to gain by implementing these additional environmental regulations, and Option B would help the populations the most.

Ultimately, it is your choice in the end. I hope you consider these points when making your decision.

Thank you for your consideration,

Ashley Thomas